DOCUMENT RESUME

ED 245 073	CE 039 058
TITLE	Oversight Hearing on the Implementation of the Job Training Partnership Act. Hearing before the Subcommittee on Employment Opportunities of the Committee on Education and Labor, House of Representatives, Ninety-Eighth Congress, Second Session (Los Angeles, California).
INSTITUTION	Congress of the U.S., Washington, D.C. House Committee on Education and Labor.
PUB DATE	14 Feb 84
NOTE	681p.; Document contains small type.
PUB TYPE	Legal/Legislative/Regulatory Materials (090) -- Viewpoints (120)
EDRS PRICE	MF04 Plus Postage. PC Not Available from EDRS.
DESCRIPTORS	Adults; Career Education; *Compliance (Legal); *Employment Programs; *Federal Legislation; Federal Programs; Hearings; *Job Training; *Program Effectiveness; Program Implementation
IDENTIFIERS	*California (Los Angeles County); Congress 98th; *Job Training Partnership Act 1982

ABSTRACT

This is a Congressional oversight hearing on the implementation of the Job Training Partnership Act (JTPA). Its purpose is to review the Los Angeles (LA) County JTPA program, with special focus on the policies driving the program. Testimony includes statements, prepared statements, letters, and supplemental materials from Congressmen, State Senators, and program participants and from individuals representing the Planning Committee of Private Industry Council; LA Regional Coalition of Service Providers; California State Job Training Coordinating Council; LA County Board of Supervisors; Western Center on Law and Poverty; Legal Aid Foundation; JTPA Office, Employment Development, State of California; LA County Private Industry Council; Opportunities Oversight Committee; and the Senate Committee on Health and Welfare, California Legislature. The text of Public Law 97-300, the JTPA, is followed by over 400 pages of appendixes with additional materials submitted for inclusion in the record, including correspondence, articles, and program reports. (YLB)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED245073

OVERSIGHT HEARING ON THE IMPLEMENTATION OF THE JOB TRAINING PARTNERSHIP ACT

HEARING

BEFORE THE

SUBCOMMITTEE ON
EMPLOYMENT OPPORTUNITIES

OF THE

COMMITTEE ON EDUCATION AND LABOR
HOUSE OF REPRESENTATIVES

NINETY-EIGHTH CONGRESS

SECOND SESSION

HEARING HELD IN LOS ANGELES, CALIF., ON FEBRUARY 14, 1984

Printed for the use of the Committee on Education and Labor

U.S. DEPARTMENT OF EDUCATION
NATIONAL INSTITUTE OF EDUCATION
EDUCATIONAL RESOURCES INFORMATION
CENTER (ERIC)

☑ This document has been reproduced as received from the person or organization originating it.

☐ Minor changes have been made to improve reproduction quality.

- Points of view or opinions stated in this document do not necessarily represent official NIE position or policy.

CE039058

U.S. GOVERNMENT PRINTING OFFICE
32-647 O
WASHINGTON : 1984

COMMITTEE ON EDUCATION AND LABOR

CARL D. PERKINS, Kentucky, *Chairman*

AUGUSTUS F. HAWKINS, California
WILLIAM D. FORD, Michigan
JOSEPH M. GAYDOS, Pennsylvania
WILLIAM (BILL) CLAY, Missouri
MARIO BIAGGI, New York
IKE ANDREWS, North Carolina
PAUL SIMON, Illinois
GEORGE MILLER, California
AUSTIN J. MURPHY, Pennsylvania
BALTASAR CORRADA, Puerto Rico
DALE E. KILDEE, Michigan
PAT WILLIAMS, Montana
RAY KOGOVSEK, Colorado
MATTHEW G. MARTINEZ, California
MAJOR R. OWENS, New York
FRANK HARRISON, Pennsylvania
FREDERICK C. BOUCHER, Virginia
GARY L. ACKERMAN, New York
SALA BURTON, California
CHARLES A. HAYES, Illinois
DENNIS E. ECKART, Ohio
TIMOTHY J. PENNY, Minnesota

JOHN N. ERLENBORN, Illinois
JAMES M. JEFFORDS, Vermont
WILLIAM F. GOODLING, Pennsylvania
E. THOMAS COLEMAN, Missouri
THOMAS E. PETRI, Wisconsin
MARGE ROUKEMA, New Jersey
STEVE GUNDERSON, Wisconsin
STEVE BARTLETT, Texas
RON PACKARD, California
HOWARD C. NIELSON, Utah
ROD CHANDLER, Washington
THOMAS J. TAUKE, Iowa
JOHN McCAIN, Arizona

Subcommittee on Employment Opportunities

AUGUSTUS F. HAWKINS, California, *Chairman*

WILLIAM (BILL) CLAY, Missouri
BALTASAR CORRADA, Puerto Rico
PAUL SIMON, Illinois
MATTHEW G. MARTINEZ, California
PAT WILLIAMS, Montana
RAY KOGOVSEK, Colorado
MAJOR R. OWENS, New York
FRANK HARRISON, Pennsylvania
GARY L. ACKERMAN, New York
CHARLES A. HAYES, Illinois
CARL D. PERKINS, Kentucky
(Ex Officio)
(Vacancy)

JAMES M. JEFFORDS, Vermont
JOHN N. ERLENBORN, Illinois
(Ex Officio)
STEVE GUNDERSON, Wisconsin
WILLIAM F. GOODLING, Pennsylvania
E. THOMAS COLEMAN, Missouri
HOWARD C. NIELSON, Utah
THOMAS J. TAUKE, Iowa
JOHN McCAIN, Arizona

CONTENTS

Page

Hearing held in Los Angeles, Calif., on February 14, 1984 1

Statement of:

- Bluto, Paul, chairman, Planning Committee of Private Industry Council ... 68
- Boyle, Howard, chair, Los Angeles Regional Coalition of Service Providers 96
- Bruinsma, Theodore, chairman, California State Job Training Coordinating Council 76
- Dymally, Hon. Mervyn M., a Representative in Congress from the State of California 3
- Edelman, Edmund D., Los Angeles County Board of Supervisors 29
- Estrada, Carmen, attorney, Western Center on Law & Poverty 92
- Greene, Bill, California State Senator 51
- Gross, Byron, staff attorney, Legal Aid Foundation of Los Angeles 101
- Grossenbacher, Karl, chief, Job Training Partnership Act Office, Employment Development Department, State of California 81
- Herman, Carl A., vice chair, Los Angeles County Private Industry Council 63
- Hufford, Harry, chief administrative officer of Los Angeles County 5
- Martinez, Hon. Matthew G., a Representative in Congress from the State of California 2
- Pearson, Barbara, member of California State Job Training Coordinating Council 78
- Pope, Alexander, assessor, county of Los Angeles 48
- Schmidt, Gregory, senior consultant to the Senate Elections and Reapportionment Committee 59
- Shaw, Doug, chairman, Opportunities Oversight Committee 67
- Smith, Nathaniel Earl, Sr., participant at East Los Angeles Employment Training Center, JTPA training site .... 1[illegible]3

Prepared statements, letters, supplemental materials, etc.:

- Boyle, Howard A., chairman, Los Angeles Regional Coalition of Service Providers, prepared statement of 99
- Bruinsma, Theo. A., chairman, California Job Training Coordinating Council, prepared statement of 77
- Dymally, Hon. Mervyn M., a Representative in Congress from the State of California, opening statement of 4
- Edelman, Edmund D., supervisor, Los Angeles County Board of Supervisors, prepared statement of 31
- Estrada, Carmen A., Western Center on Law & Poverty, Inc., Los Angeles, Calif., prepared statement of 94
- Greene, Bill, California State Senator, prepared statement of 56
- Gross, Byron, senior attorney, Legal Aid Foundation of Los Angeles, prepared statement of 103
- Grossenbacher, Karl, chief, Job Training Partnership Office, Employment Development Department, State of California, prepared statement of 91
- Herman, Carl A., vice chair, Los Angeles County Private Industry Council, prepared statement of 66
- Hufford, Harry, chief administrative officer, Los Angeles, Calif., prepared statement with several attachments 8
- Pearson, Barbara, member of California State Job Training Coordinating Council, prepared statement of 79
- Pope, Alexander, assessor, Los Angeles County, prepared statement of 50
- Schmidt, Gregory, senior consultant, Senate Elections and Reapportionment Committee, prepared statement of 61
- Text of Public Law 97-300 159

Page

Prepared statements, letters, supplemental materials, etc.—Continued
- Watson, Diane E., chairperson, Senate Committee on Health and Welfare, California Legislature, letter to Chairman Hawkins, dated February 14, 1984, enclosing comments 58

APPENDIX

Boyle, Howard A., chairman, Los Angeles Regional Coalition of Service Providers, Inc., Los Angeles, Calif.:
- Letter to "Dear Decision Maker," dated March 13, 1984, enclosing, "Service Provider Study" 487
- Questionnaire sent to service providers regarding Los Angeles County JTPA program 508

Estrada, Carmen A., Western Center on Law & Poverty, Inc., Los Angeles, Calif.:
- Exhibit A 428
- Exhibit B 429
- Exhibit C 453
- Court Case No. C470221, first amended complaint for injunctive relief 616
- Resolution with several attachments 541
- Statement of concurrence 540
- TPA interim plan and subgrant agreement October 1983 through June 1984 539

Galloway, Donald G., director, Department of Community Services, county of Los Angeles:
- Executive summary, report on employment and training program for former general relief recipients 631
- Letter to "Each Supervisor," subject: County employment and training program, dated January 9, 1984 667
- Letter to: "Each Supervisor," subject: County employment and training program for former general relief recipients 629
- "Report," with attachments 633

Grossenbacher, Karl W., chief, Job Training Partnership Office, Employment Development Department, State of California:
- Letter to A. Brooks Firestone, founder and general partner, Firestone Vineyard, Los Olivos, Calif., dated October 27, 1983, with several attachments 645
- Letter to Chairman Hawkins, dated February 24, 1984, enclosing several attachments 237
- Service Delivery Area Field Liaison Guide, overview, with several attachments 304

Hellerman, Manuel, chairman, for the Social Services Commission, City of Santa Monica, Calif., letter to Hon. Deane Dana, dated December 20, 1983 516

Hufford, Harry L., chief administrative officer, county of Los Angeles, Los Angeles, Calif.:
- "Executive Summary," subject: County employment and training program 523
- Letter to, dated December 5, 1983, enclosing declaration of findings for complaint against Los Angeles County SDA 535
- Letter to "Each Supervisor," subject: Reports on county employment and training program, dated January 9, 1984 665
- Letter to "Each Supervisor," subject: Financing requirements of county employment and training program and AFDC caseload, dated January 9, 1984 661
- Letter to honorable board of supervisors, dated January 6, 1984, with attachments 524
- Minutes of the board of supervisors, county of Los Angeles, State of California 522

Kiddoo, Kay, director, Employment Development Department, State of California, letter from Chairman Hawkins, dated February 28, 1984 463

Lyons, Matthew, LACW, Los Angeles, Calif., letter dated February 13, 1984, enclosing several statements 399

Motion by Supervisor Edmund D. Edelman 520

Pei, Chih Hsing, executive director, Chinese Restaurants Association City of Commerce, Calif., letter to Hon. Edmund D. Edelman, Los Angeles County 3d District supervisor, dated January 11, 1984 518

Page

Sklar, Morton H., project director and legal counsel, Jobs Watch Project, Center for National Policy Review, Catholic University Law School, Wash., D.C.:
  - "Major JTPA Problems for Youth in Houston, Women in Los Angeles," article from Jobs Watch Alert, October 24, 1983 478
  - Testimony on 469

Watson, Diane E., chairperson, California Legislature, senate Committee on Health and Welfare, letter to Chairman Hawkins, dated February 20, 1984, enclosing comments 466

OVERSIGHT HEARING ON THE IMPLEMENTATION OF THE JOB TRAINING PARTNERSHIP ACT

TUESDAY, FEBRUARY 14, 1984

House of Representatives,
Subcommittee on Employment Opportunities,
Committee on Education and Labor,
Los Angeles, Calif.

The subcommittee met, pursuant to call, at 9 a.m., in room 1122, State Office Building, 107 South Broadway, Los Angeles, Calif., Hon. Augustus Hawkins (chairman) presiding.

Members present: Representatives Hawkins, Dymally, and Martinez.

Staff present: Susan G. McGuire, staff director; Carole Schanzer, deputy staff director; Beth Buehlmann, Republican senior legislative associate.

Mr. **Hawkins**. The Subcommittee on Employment Opportunities of the House Education and Labor Committee is called to order.

This morning the hearing will focus on the implementation of the Job Training Partnership Act.

The members present this morning are Congressman Matthew Martinez with the 30th District, who is seated to my left, and Congressman Mervyn Dymally of the 31st District, who is seated to my right.

The meeting was scheduled at 9 o'clock to accommodate members of the board of supervisors. I don't see any of those members present, but we will call on them when they arrive this morning. Supervisor Hahn has indicated that he would not be able to attend until early this afternoon. All of the board members have been invited. Supervisor Dana, who was to have represented the views of the board, recently declined. As I have indicated, Mr. Hahn is also expected to appear, as well as Mr. Edelman. The chief administrative officer, Mr. Harry Hufford, will also be representing the board this morning. We wanted to make it clear that we felt that the presentation of the plan officially to the members of this committee would be done by the official representatives of the board of supervisors.

Fifteen months ago Congress enacted the Job Training Partnership Act to replace the expiring CETA legislation. As one of the primary authors of this legislation, as well as its predecessor, I am well aware of the difficult decisions which were made, first, to assure a continued Federal commitment to job training for the economically disadvantaged, and, second, to provide a delicate balance between the rights and responsibilities of the parties to the partnership—local government, State government, private employers and the Federal Government as well.

It was then my strong belief, and it is a belief I continue to hold, that the decisions on appropriate training are best made at the local level, taking into account local economic conditions and the particular demographic factors.

It has been most disappointing to witness the almost total abdication of responsibility for policy development, technical assistance and monitoring which the Department of Labor has demonstrated. It is, therefore, vitally important that the Congress carry on vigorous and responsible oversight to assure compliance with the intent of the law and to evaluate the effectiveness of the programs carried out under the act. We will hold the new act accountable to the same standards by which the CETA programs were judged. It is in this context that the Subcommittee on Employment Opportunities has come to Los Angeles this morning to review the Los Angeles County Job Training Partnership Act program.

I recognize that the actual implementation of the act is in its infancy. Plans have only been operational since October 1983, and there is, as yet, little information on which to base a judgment on the success or failure of any particular program. However, the governance structure established under JTPA, as well as many of the programmatic aspects of the act, reflect such a significant departure from CETA that it is important to get an early assessment of policy changes resulting from these provisions. It is for this reason this morning's hearing will focus on the policies driving the program in Los Angeles County. We will be following with great interest in the coming months the implementation of the Los Angeles County plan and its service to various segments of the county's eligible population.

While much of the controversy surrounding the Los Angeles County plan focuses on the targeted service to general relief recipients, I believe this issue illustrates the tragic shortcomings of our national employment policies. While unemployment is still at historically high levels nationwide and while unemployment among certain groups in the labor force, including blacks, Hispanics, and youth, is at a catastrophic level, funds for employment and training programs unfortunately have been declining. Since 1981 Federal funds for employment and training declined by two-thirds; at the same time, the number of persons unemployed climbed by 50 percent. It is not surprising that one needy group is pitted against others when funds to assist jobless individuals are so limited.

At this time, the Chair would like to call on Mr. Martinez for a statement, if he desires to make one.

STATEMENT OF HON. MATTHEW G. MARTINEZ, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF CALIFORNIA

Mr. MARTINEZ. Well, to be very brief, first to thank you, Mr. Chairman, for giving us the opportunity to hear this testimony today.

I have read some of the articles concerning the apparent abuse of the Job Training Partnership Act program. When, in the Labor Committee, we talked about this program, I saw great hope for my district with the passage of this program. It seems that, if the current trend continues, very few people in my district will be able to benefit. The people I'm thinking about basically are those that are long-termed unemployed.

Of course, the present administration seems to feel that the current rate of unemployment is something to celebrate, but I can assure you that my constituents, who have been out of work for a long time, are not joining in that celebration. More than that, I hope they intend to do something about it at the polls.

Hopefully, we may be able to shed some light on why what seems to have occurred, has occurred, and, if, in fact, there is anything we can do about it.

Mr. **Hawkins**. Thank you. Mr. Dymally.

STATEMENT OF HON. MERVYN M. DYMALLY, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF CALIFORNIA

Mr. **Dymally**. Thank you very much, Mr. Chairman.

I want to begin by thanking Congressman Hawkins for holding a hearing on this very important matter which I consider to be crucially important, both for Los Angeles and for the Job Training Partnership Act itself.

Those of us who joined Chairman Hawkins and Mr. Jeffords, the ranking minority member of the Employment Opportunities Subcommittee, in the many months of hard work which led to the passage of this act, have almost a personal relationship with it. Each of our most fondly held beliefs about the proper way to carry out job training was tested during the debate and the give and take that resulted in the final act. We are proud of the aspects of the bill that are consistent with our own philosophy, and I expect we still are chagrined by those aspects of the bill which are not consistent with our philosophy. But every one of us, Democrat and Republican alike, wants desperately for this act to fulfill the purpose for which it was intended.

During the testimony taken before the final draft of the bill was voted on, Members of Congress were told that our unemployment rate could not be blamed solely on the recession. We were told that, after the recession had ended, there would be a residue of structural unemployment. That is, people, as many as eight million, would remain unemployed, not because of a sluggish economy, but because of the changed job needs of the Nation. People who had worked their lives in a single occupation would find their skills to be obsolete. They would find themselves trained to do a job that would no longer exist. Moreover, they would find that they lacked the skills to qualify for new jobs.

So we're here today to examine how one of our major metropolitan areas has chosen to make use of funds from the Job Training Partnership Act. Is the Los Angeles program achieving the intended purpose of the act? Is it training and retraining the southern California work force to assume the jobs of the eighties and beyond? Is the program substantially reducing the level of structural unemployment in Los Angeles County? Is the Los Angeles area Private Industry Council demonstrating the job market foresight we expected of it when we gave it control over administering the program?

The Congress has heard that the Los Angeles program represents, what for want of a better term we might call a "creative" use of the act. I suspect it is a use which was not envisioned by those who wrote and approved the act. I am, therefore, very anxious to hear the testimony that will be presented here today. It may well have a significant impact on the provisions of the act in years to come.

Thank you very much, Mr. Chairman. I'd like my statement to be entered into the record.

Mr. HAWKINS. Thank you, Mr. Dymally.

[Opening statement of Congressman Dymally follows:]

OPENING STATEMENT OF HON. MERVYN M. DYMALLY, A REPRESENTATIVE IN CONGRESS FROM THE STATE OF CALIFORNIA

I want to begin by thanking Chairman Augustus Hawkins for holding this hearing on a matter which I consider to be crucially important both the Los Angeles and for the Job Training Partnership Act itself. Those of us who joined Chairman Hawkins and Mr. Jeffords, the ranking minority member of the Employment Opportunities Subcommittee, in the many months of hard work which led to passage of the Job Training Partnership Act have almost a personal relationship with it. Each of our most fondly held beliefs about the proper way to carry out job training was tested during the debate and the give and take that resulted in the final act. We are proud of the aspects of the bill that are consistent with our own philosophy and, I expect, we are still chagrined by those aspects of the bill which are not consistent with our philosophy. But every one of us. Democrat and Republican alike, wants desperately for this act to fulfill the purpose for which it was intended.

The act was hammered out in the waning days of the Comprehensive Employment and Training Act, popularly known as CETA. The Nation was slipping toward the day that there were 12 million Americans counted as unemployed. At the same time, we knew there were many more unemployed who were not counted because, out of discouragement, they has stopped looking for employment, and so, were no longer traceable by the Department of Labor.

During testimony taken before the final draft of the bill was prepared, Members of Congress were told that our unempolyment rate could not be blamed solely on the recession. We were told that after the rescession had ended, there would be a residue of structural unemployment. That is, people—as many as 8 million people—would remain unemployed not because of a sluggish economy but because the job needs of the nation would have changed. And people who had worked their lives in a single occupation would find skills to be obsolete. They would find themselves trained to do a job that would no longer exist. Moreover, they would find that they lacked the skills to qualify for the new jobs.

The Job Training Partnership Act was designed to help the nation make the all important adjustment to a world of work which required new skills. The CETA program had been accused of training people for jobs that were not in demand. Congress solution to this problem in the new act was the Private Industry Council or PIC. Who could better judge the skill needs of the work force than those who run the businesses and industries? Who could better determine a candidate selection process that would deliver the most potentially employable trainees for the least number of training dollars than the very people who would hire the trainees? That is why private industry was given a majority vote on the Council.

Many Members of Congress wanted first access to job training to go to those who had demonstrated their commitment to work through a career of previous employment. Many felt that these people displaced through structural unemployment deserved retraining first. In part, that is why mandated stipends during the training or retraining period were not included in the Act—even though some of us objected strenuously to this omission. Those who wanted no stipends reasoned that only those who truly intended to use training to prepare themselves for new careers would endure a training process that provided no means of support during the training period. In the end a compromise was struck. A subsistence stipend is not mandated in the Act. Rather, that option is now one that must be decided upon actively by each Private Industry Council.

The Job Training Partnership Act was perhaps the best piece of job training legislation that a two party Congress faced with the need for austerity could produce. I would note that funds for the program were cut nearly in half before the bill was given over to the President for his signature. Under current Executive Branch policy, only about half of the congressionally authorized funds have been released, and in the budget request for fiscal year 1985 the President is asking the Congress to institutionalize current policy by cutting the official authorization for 1985 from the currently authorized level of $6,419,000,000 to $3,523,000,000.

We are here today to examine how one of our major metropolitan areas has chosen to make use of funds from the Job Training Partnership Act. Is the Los Angeles Program achieving the intended purposes of the act? Is it training and retraining the southern California work force to assume the jobs of the eighties and beyond? Is the program substantially reducing the level of structural unemployment in southern California? Is the Los Angeles area Private Industry Council demonstrating the job market foresight we expected of it when we gave it control over administering the act?

The Congress has heard that the Los Angeles program represents what for want of a better term we might call a "creative" use of the act. I suspect it is a use which was not envisioned by those who wrote and approved the Job Training Partnership Act. I am, therefore, anxious to hear the testimony that will be presented here today. It may well have a significant impact on the provisions of the act in years to come.

Mr. HAWKINS. Thank you, Mr. Dymally.

The first panel will consist of members of the county board of supervisors or their representatives. I do not see any of the members present.

Mr. HUFFORD. Mr. Chairman, I'm Harry Hufford, the county administrative officer.

Mr. HAWKINS. Yes. Mr. Hufford, would you be seated.

It looks like Mr. Hufford is the panel at this time.

Mr. HUFFORD. Well, sir, I do know Mr. Edelman is expected to testify also. I would prefer to have my elected supervisor speak first, but he is not here and I can offer the testimony as the county administrator, and then I'm sure he'll be here shortly thereafter.

Mr. HAWKINS. We are pleased to have you.

We have the statement here with us. It will be entered into the record in its entirety, and you may proceed to deal with it as you so desire.

Mr. HUFFORD. Thank you.

STATEMENT OF HARRY HUFFORD, CHIEF ADMINISTRATIVE OFFICER OF LOS ANGELES COUNTY

Mr. HUFFORD. I am Harry Hufford, the chief administrative officer of Los Angeles County. I am very pleased that I have the opportunity to testify before this subcommittee because the county's use of Job Training Partnership Act funds in its employment and training efforts has been misunderstood at times and attacked at others. The county is making a very large investment of county funds in an attempt to provide the necessary training and support services to welfare recipients. The county is using only a small portion of its JTPA allocation in this program.

Our objective in targeting a portion of the JTPA funds for former general relief recipients must be put into proper context. To do so, I would like to highlight three points.

First, the growth in the general relief caseload; second, the public policy of training general relief employables; third, the amount of JTPA funds used for training general relief recipients compared to nongeneral relief recipients.

The growth in the general relief caseload: First, I would like to comment on the substantial growth in the general relief program in Los Angeles County over the past several years. On attachment I you will see that in 1980-81 our average caseload was 19,221, and our annual net county cost was $41.3 million, all local funding. In 1983-84 our average caseload was estimated at 32,436 at a projected cost of $75.3 million, again all local funding. This recent caseload growth is the result of the following factors.

First, there has been an increase in the number of employable general relief recipients. This is due to the loss of CETA job opportunities and a trend of rising unemployment in general. This trend has only recently been reversed and we are optimistic about this improvement.

Second, there has been an increase in the number of unemployable general relief recipients. This is due to a decline in the transfer of unemployable persons to the federally funded supplemental security income program [SSI]. This has resulted from prior Federal efforts to restrict SSI program expenditures.

Third, there is the conversion of refugees to the general relief program. Changes in the Federal law eliminated eligibility for refugee assistance once the refugee has been in the United States for 18 months. The conversion of these refugees to the general relief program has continued to impact county costs as the limited Federal reimbursement for refugees expires.

As you can see, the growth in the county's mandated program of last resort is reflecting not only the economy in general but the implementation of Federal policies that have shifted costs from the Federal and State governments to the counties. Therefore, utilizing Federal JTPA funds to defray a small portion of the costs of training the county's general relief employables is entirely appropriate. In fact, it should be maximized to offset the tremendous burden to local taxpayers of the mandated general relief program.

The issue of public policy of training general relief recipients: Next I would like to respond to criticisms of the board of supervisors' policy of providing a training opportunity for general relief recipients. I think we all have to agree that the general relief recipients are among those most in need of assistance in becoming employable. By creating a county employment and training program and targeting the employable portion of the general relief caseload, we expect to see several benefits.

First, we expect to see the achievement of economic self-sufficiency for individuals who would otherwise be dependent upon welfare subsidies.

Second, we anticipate an improvement of the general economic outlook of the county as former welfare recipients become taxpayers, consumers, and contributors to local productivity.

In fact, the former general relief recipients and those participants who would have been eligible for general relief without this training and employment resource represent every significant segment group targeted for services under JTPA. These include women, veterans, the handicapped, and each of the age and ethnic categories.

The county's employment and training program is not a new idea. The concept is based on a successful pilot program instituted during 1982-83 in Los Angeles County. This innovative pilot program offered employment and training opportunities available under the CETA program to approximately 1,800 general relief and State AFDC-U welfare recipients. This demonstration effort achieved positive results, both in terms of improving the employability of the participants and in achieving a financial benefit to the county.

By providing appropriate employment and training services to the target client population, the county is enhancing their employability, their marketable skills, and, therefore, their potential for higher wages. In addition, participants receive employment services which include job development, job placement, and job retention skills. Providing these opportunities for general relief employables is good public policy and should not be abandoned.

Use of JTPA funds for training general relief recipients: Lastly, I want to comment on the extent to which Los Angeles County is using JTPA funds for training general relief recipients. As I have said before, only a small portion of the $35.4 million in title IIA JTPA funds available for residents in all of the service delivery areas of Los Angeles County is being used to support the county employment and training program. If we look at the chart that is attached to my statement on JTPA funding for countywide title IIA programs, we see that only 12.7 percent of $4.5 million is being used for training former general relief recipients. The remaining 87.3 percent of Federal funding is directed toward nongeneral relief participants. Of the title IIA JTPA funds coming directly to the county, as contrasted with the areawide figures I've just described, only 35.4 percent is being used for training and stipend costs for the general relief recipients. The remainder of our allocation is being used for services to nongeneral relief adults, youth, and allowable administrative costs If the goal is to allocate more JTPA slots to non-GR's, this should be accomplished by increasing the county's overall JTPA funds. I'd like to repeat that. If the goal is to allocate more JTPA slots to non-GR's, this should be accomplished by increasing the county's overall JTPA funds. That is our firm recommendation. It should not be accomplished by reducing the slots we are currently using for training former general relief recipients.

In addition to the JTPA title IIA funds, the county administers $11.9 million in JTPA funds for displaced workers, older Americans, and for the summer employment of youth. Attachment III is a separate report describing the county JTPA program and the county employment and training program.

We firmly believe that the initial objectives of the county employment and training program remain valid. At the same time, we recognize that the program design was flawed in that it was based on projections of smaller caseloads. We are currently wrestling with ways in which to handle the problems created by large caseloads and delays we encountered in implementing proper administrative procedures. We are currently taking action to resolve these problems. You can be assured that we will continue to refine our use of JTPA training slots to maximize their effectiveness in meeting our common goal of providing meaningful training and job placement in the private sector.

I want to thank you for permitting me this opportunity to present the county's position and I would try to answer questions you might like to ask.

[Prepared statement of Harry Hufford follows:]

PREPARED STATEMENT OF HARRY HUFFORD, CHIEF ADMINISTRATIVE OFFICER, LOS ANGELES, CALIF.

I AM HARRY HUFFORD, THE CHIEF ADMINISTRATIVE OFFICER OF LOS ANGELES COUNTY. I AM VERY PLEASED THAT I HAVE THE OPPORTUNITY TO TESTIFY BEFORE THIS SUBCOMMITTEE BECAUSE THE COUNTY'S USE OF JTPA FUNDS IN ITS EMPLOYMENT AND TRAINING EFFORTS HAS BEEN MISUNDERSTOOD AT TIMES AND ATTACKED AT OTHERS. THE COUNTY IS MAKING A VERY LARGE INVESTMENT OF COUNTY FUNDS IN AN ATTEMPT TO PROVIDE THE NECESSARY TRAINING AND SUPPORT SERVICES TO WELFARE RECIPIENTS. THE COUNTY IS USING ONLY A SMALL PORTION OF ITS JTPA ALLOCATION IN THIS PROGRAM.

OUR OBJECTIVE IN TARGETING A PORTION OF THE JTPA FUNDS FOR FORMER GENERAL RELIEF RECIPIENTS MUST BE PUT INTO PROPER CONTEXT. TO DO THIS I WOULD LIKE TO HIGHLIGHT THREE POINTS:

-- FIRST, THE GROWTH IN THE GENERAL RELIEF CASELOAD

-- SECOND, THE PUBLIC POLICY OF TRAINING GENERAL RELIEF EMPLOYABLES

-- THIRD, THE AMOUNT OF JTPA FUNDS USED FOR TRAINING GENERAL RELIEF RECIPIENTS COMPARED TO NON-GENERAL RELIEF RECIPIENTS

GROWTH IN THE GENERAL RELIEF CASELOAD

FIRST I WOULD LIKE TO COMMENT ON THE SUBSTANTIAL GROWTH IN THE GENERAL RELIEF PROGRAM IN LOS ANGELES COUNTY OVER THE PAST SEVERAL YEARS. ON ATTACHMENT I YOU WILL SEE THAT IN 1980-81 OUR AVERAGE CASELOAD WAS 19,221 AND OUR ANNUAL NET COUNTY COST WAS $41.3 MILLION. IN 1983-84 OUR AVERAGE CASELOAD WAS ESTIMATED AT 32,436 AT A PROJECTED COST OF $75.3 MILLION. THIS RECENT CASELOAD GROWTH IS THE RESULT OF THE FOLLOWING FACTORS:

-- First, there has been an increase in the number of employable General Relief recipients. This is due to the loss of CETA job opportunities and a trend of rising unemployment in general. This trend has only recently been reversed and we are optimistic about this improvement.

-- Second, there has been an increase in the number of unemployable General Relief recipients. This is due to a decline in the transfer of unemployable persons to the Federally funded Supplemental Security Income (SSI) program. This has resulted from prior Federal efforts to restrict SSI program expenditures.

-- Third, there is the conversion of refugees to the General Relief program. Changes in the Federal law eliminated eligibility for refugee assistance once the refugee has been in the United States for 18 months. The conversion of these refugees to the General Relief Program has continued to impact County costs as the limited Federal reimbursement for refugees expires.

As you can see, the growth in the County's mandated program of "last resort" is reflecting not only the economy in general but the implementation of Federal policies that have shifted costs from the Federal and State governments to the Counties. Therefore, utilizing Federal JTPA funds to defray a small portion of the costs of training the County's General Relief Employables is entirely appropriate. In fact, it should be maximized to offset the tremendous burden to local taxpayers of the mandated General Relief program.

PUBLIC POLICY OF TRAINING GENERAL RELIEF RECIPIENTS

NEXT I WOULD LIKE TO RESPOND TO CRITICISMS OF THE BOARD OF SUPERVISORS' POLICY OF PROVIDING A TRAINING OPPORTUNITY FOR GENERAL RELIEF RECIPIENTS. I THINK WE ALL HAVE TO AGREE THAT THE GENERAL RELIEF RECIPIENTS ARE AMONG THOSE MOST IN NEED OF ASSISTANCE IN BECOMING EMPLOYABLE. BY CREATING A COUNTY EMPLOYMENT AND TRAINING PROGRAM AND TARGETING THE EMPLOYABLE PORTION OF THE GENERAL RELIEF CASELOAD WE EXPECT TO SEE SEVERAL BENEFITS.

-- FIRST, WE EXPECT TO SEE THE ACHIEVEMENT OF ECONOMIC SELF-SUFFICIENCY FOR INDIVIDUALS WHO WOULD OTHERWISE BE DEPENDENT UPON WELFARE SUBSIDIES.

-- SECOND, WE ANTICIPATE AN IMPROVEMENT OF THE GENERAL ECONOMIC OUTLOOK OF THE COUNTY AS FORMER WELFARE RECIPIENTS BECOME TAXPAYERS, CONSUMERS AND CONTRIBUTORS TO LOCAL PRODUCTIVITY.

IN FACT, THE FORMER GENERAL RELIEF RECIPIENTS, AND THOSE PARTICIPANTS WHO WOULD HAVE BEEN ELIGIBLE FOR GENERAL RELIEF WITHOUT THIS TRAINING AND EMPLOYMENT RESOURCE, REPRESENT EVERY SIGNIFICANT SEGMENT GROUP TARGETED FOR SERVICES UNDER JTPA. THESE INCLUDE WOMEN, VETERANS, THE HANDICAPPED, AND EACH OF THE AGE AND ETHNIC CATEGORIES.

THE COUNTY'S EMPLOYMENT AND TRAINING PROGRAM IS NOT A NEW IDEA. THE CONCEPT IS BASED ON A SUCCESSFUL PILOT PROGRAM INSTITUTED DURING 1982-83 IN LOS ANGELES COUNTY. THIS INNOVATIVE PILOT PROGRAM OFFERED EMPLOYMENT AND TRAINING OPPORTUNITIES AVAILABLE UNDER THE COMPREHENSIVE EMPLOYMENT AND TRAINING ACT TO APPROXIMATELY 1,800 GENERAL RELIEF AND STATE AFDC-U WELFARE RECIPIENTS. THIS DEMONSTRATION EFFORT ACHIEVED POSITIVE RESULTS, BOTH IN TERMS OF IMPROVING THE EMPLOYABILITY OF THE PARTICIPANTS AND IN ACHIEVING A FINANCIAL BENEFIT TO THE COUNTY.

By providing appropriate employment and training services to the target client population, the County is enhancing their employability, their marketable skills, and therefore, their potential for higher wages. In addition, participants receive employment services which include job development, job placement and job retention skills.

Providing these opportunities for General Relief Employables is good public policy and should not be abandoned.

Use of JTPA Funds for Training General Relief Recipients

Lastly, I want to comment on the extent to which Los Angeles County is using JTPA funds for training General Relief recipients. As I have said before, only a small portion of the $35.4 million in Title IIA JTPA funds available for residents in all of the Service Delivery Areas of Los Angeles Areas County is being used to support the County Employment and Training Program. If we look at the attached chart on JTPA funding for County-wide Title IIA programs, we see that only 12.7% or $4.5 million is being used for training former General Relief recipients. The remaining 87.3% is directed toward non-General Relief participants.

Of the Title IIA JTPA funds administered by the County, only 35.4% is being used for training and stipend costs for the General Relief participants. The remainder of our allocation is being used for services to non-General Relief adults, youth, and allowable administrative costs. If the goal is to allocate more JTPA slots to non-GR's, this should be accomplished by increasing the County's overall JTPA funds. It should not be accomplished by reducing the slots we are currently using for training former General Relief recipients.

In addition to the JTPA Title IIA funds, the County administers $11.9 million in JTPA funds for displaced workers, older workers and for the summer employment of youth. Attachment III is a separate report describing the County JTPA program and the County Employment and Training Program.

We firmly believe that the initial objectives of the County Employment and Training Program remain valid. At the same time, we realize that the program design was flawed in that it was based on projections of smaller caseloads. We are currently wrestling with ways in which to handle the problems created by large caseloads and delays we encountered in implementing proper administrative procedures. We are currently taking action to resolve these operational problems. You can be assured that we will continue to refine our use of JTPA training slots to maximize their effectiveness in meeting our common goal of providing meaningful training and job placement in the private sector.

Once again I want to thank you for this opportunity to clarify the County's position and I am anxious to answer any questions you may have.

Attachment I

I. GENERAL RELIEF PROGRAM GROWTH

	Average Caseload	Net County Cost (In Millions)	Accumulated Percentage Increase
1980-81	19,211	$41.3	-
1981-82	22,196	51.0	23.5%
1982-83	30,245	69.2	67.6%
1983-84 (estimate)	32,436	75.3	82.3%

II. 1983-84 JOB TRAINING PARTNERSHIP ACT (In Millions of Dollars)

1983-84 Budget	Total Appropriation	GR Referrals	Other Participants	DCS/ Admin
Title IIA				
Adult (56%)	7.1	4.5	1.5	1.1
Youth (44%)	5.6	--	4.8	0.8
Subtotal	12.7*	4.5	6.3	1.9
Precentage of Total	100.0%	35.4%	49.6%	15.0%

*Does not include CETA carryover funds.

COUNTY-WIDE ESTIMATED SDA ALLOCATION OF JTPA FUNDS BY SUPERVISORIAL DISTRICT

(In Millions of Dollars)

JTPA Funds	1		2		3		4		5		Total	
	Amt.	%	Amt.	%	Amt.	%	Amt.	%	Amt.	%	Amt.	%
Available for GR	$1.2	20.0	$ 1.0	8.1	$1.1	15.1	$0.7	12.7	$ 0.5	11.9	$ 4.5	12.7
Available for Non-GR	4.8	80.0	11.4	91.9	6.2	84.9	4.8	87.3	3.7	88.1	30.9	87.3
Total*	$6.0		$12.4		$7.3		$5.5		$ 4.2		$35.4	

*Includes the following Services Delivery Areas (SDA's)

- -- County of Los Angeles
- -- Los Angeles City
- -- Long Beach
- -- Torrance
- -- Verdugo
- -- Foothill
- -- Southeast L.A. Consortium
- -- Southbay SDA Consortium

See Attachment III for details.

Attachment II

ATTACHMENT III

REPORT
1983-84 COUNTY OF LOS ANGELES
JOB TRAINING PARTNERSHIP ACT (JTPA) PROGRAM

TESTIMONY SUBMITTED BY HARRY L. HUFFORD
LOS ANGELES COUNTY CHIEF ADMINISTRATIVE OFFICER
FOR THE
HOUSE SUBCOMMITTEE ON EMPLOYMENT OPPORTUNITIES HEARING
IN LOS ANGELES
FEBRUARY 14, 1984

SUMMARY

In fiscal year 1983-84, Los Angeles County is operating two discrete and separately funded employment and training programs. One is the Job Training Partnership Act (JTPA) Program, which includes approximately $25 million of Federal funds and to which the County is contributing approximately $1.7 million of County General Fund monies. The JTPA Program is described in detail in Attachment A.

This year, the County's Federal JTPA IIA Program, with which the County's separate Employment and Training Program is most often confused, will provide services to over 6,800 participants and will target all significant segments of the population including men and women, all ethnic groups, veterans, school dropouts, handicapped and others. 44% of the program's resources are devoted to youth. Among the significant segments served, some of the participants (less than 50%) are also former General Relief recipients. The County's JTPA Program also includes separate components for displaced workers, a summer youth program, an older workers program and a vocational education program.

The second program is the County's Employment and Training Program which is entirely County General Fund financed. This program provides a variety of employment and training services to approximately 13,000 participants, all of whom are former General Relief recipients. The County's General Fund financed Employment and Training Program is detailed in Attachment B.

The two programs are separately funded, serve different populations, and the service components are also quite different. The

JTPA Program services are provided entirely through contracts between the County and private service providers and consortia. These services include job skills training and job placement. The County Employment and Training Program includes contractual services for remedial education and English as a second language, however, most of this program's services are delivered directly.

ATTACHMENT A

COUNTY OF LOS ANGELES 1983-84
JOB TRAINING PARTNERSHIP ACT (JTPA) PROGRAMS

In 1983-84 the County of Los Angeles is operating a variety of JTPA Programs: the JTPA IIA Program, the JTPA III Displaced Worker Program, the JTPA Summer Youth Employment Program, the JTPA Older Workers Program and the JTPA Vocational Educational Program.

The JTPA program is administered through a partnership of the Los Angeles County Board of Supervisors and the Private Industry Council (PIC). The nineteen PIC members are appointed by the Board of Supervisors and the majority represent the private sector. The County's PIC has established a very strong and productive working relationship with the Board of Supervisors and has brought valuable private sector resources and perspective to the JTPA program.

COUNTY OF LOS ANGELES JTPA FUNDS

JTPA Funds in millions of dollars

JTPA II A	$13.4
JTPA III Displaced Workers	$ 1.9
JTPA - Summer Youth	$ 8.5
JTPA - Older Workers	$ .5
JTPA - Vocational Education	$ 1.0

JTPA IIA Program

Under the Title IIA Program, the County has been allocated $13.4 million, which includes carryover from the previous year. The County is contributing approximately $1.74 million to the program.

Program services will be delivered to over 6800 participants and will include all significant segments of the population. The significant segment goals of the program are detailed on the following page. Groups to be served include men and women, all ethnic groups, veterans, school drop-outs, handicapped and others. 44% of the Federal program resources are devoted to youth. Among these significant segments are persons (less than 50%) who are also former General Relief recipients.

Skills training and job placement services are provided to participants by County contractors. The County has contracts with 55 service providers including community based organizations, private-for-profit training agencies, private employers, school districts and consortia.

The contracts with service providers are performance contracts based upon the private sector model which provides that payments under the contract be made only after performance has been achieved. The County's JTPA contract provides that the operating agencies will be compensated on the basis of fixed unit prices. The cost of administration, training services and allowances are included in a maximum fixed rate fee per participant. The fixed rate fee is reimbursed to the operating agencies in

JTPA TITLE IIA PROGRAM GOALS
10/1/83 through 6/30/84

CLIENT CHARACTERISTICS	EST. MODIFIED IIA PLAN GOALS *
Total Participants	6822
Male	4656
Female	2166
14-15 year olds	-0-
16-19 year olds	1457
20-21	718
22-44	3822
45-54	265
55 and over	560
White (Non-Hispanic)	958
Black (Non Hispanic)	1743
Asian/Pacific Islander	506
American Indian/Alaskan	68
Hispanic	3547
School Dropouts	1495
AFDC Registrants	682
Handicapped	477
Unemployment Insurance Claimant	224
Veterans	1171

*The County is in the process of modifying its JTPA Plan. The figures shown are estimates of modified plan goals. The final modification to the State is due by March 15, 1984.

increments upon completion of (1) enrollments, (2) entered training, (3) training completions, and (4) placements. Reimbursements for placements occur only when participants are placed in unsubsidized employment and for a reasonable wage rate as specified in the contracts.

Contractors are required to provide entry level training in demand occupations which include the following:

Assembler/basic machinist
Bank tellers
Childcare Workers
Custodial
Computer service technician
Construction
Credit verifiers
Data entry
Diesel mechanics
Electronic assembler
Food service
Furniture finishers
Handyman
Home health aides
Medical technician
Landscape gardeners
Receptionist
Security guards
Sheet metal fabricators
Warehousing
Word processors

Training slot costs have been negotiated with contractors to provide for the maximum number of participants in the program given the funding available and the nature of the training for entry level occupations. The average slot cost is $3,756.
While in training any former General Relief recipient in the JTPA program will continue to receive a stipend equal to what they would have received on welfare. They also have available

the same health care services, food stamp eligibility, transportation allowance and other benefits.

Program Results

As of December 31, 1983, the first three months of the training program were completed. The training programs are planned for two 4 1/2 month cycles. Although the first training cycle was not completed at the end of three months, of those participants completing training, 31% had been placed in unsubsidized employment.

JTPA Title III Displaced Worker Program

Los Angeles County has administered Federally funded displaced worker programs since early 1982. In Fiscal Year 1983-84 the County has competed successfully for approximately $1.9 million for displaced worker programs.

The purpose of these grants is to provide assessment and/or training and placement services to more than 1,900 dislocated workers from such plants as General Motors, Bethlehem Steel, Huffy and Aeroquip Corporations.

In the first two months of operation, several training projects have been funded as follows:

1. A joint training effort between the United Auto Workers and Rockwell International to train displaced workers in Palmdale in thermal splash pattern protection, structural assembly and electrical installation for hiring by Rockwell in February of 1984.

2. An employer on-site training program at Norris NI Industries in which displaced workers will receive instructional training in machinist trades and subsequent placement at Norris.

3. An electronic technician training program for displaced workers with pre-commitments by employers to hire upon completion of training.

4. Provision of on-the-job training for ex-General Motors workers, and other displaced workers from surrounding small businesses.

County Employment and Training Action Council (ETAC)

To coordinate and streamline provision of services to displaced workers, in February 1983 the Los Angeles Board of Supervisors established a county-wide coordinating body, the County Employment and Training Action Council (ETAC). The ETAC coordinates the efforts of public and private agencies in dealing with problems of plant closures and employment and training needs of displaced workers. Membership agencies include State Departments of Employment Development, Education, Industrial Relations, and Rehabilitation; labor unions; community college districts; Los Angeles City and County Superintendents of Schools; the United States Department of Labor; the County's Private Industry Council; other Service Delivery Areas; and the Economic Development Corporation of Los Angeles County.

JTPA IIA STATE DISCRETIONARY VOCATIONAL EDUCATION GRANT

The County of Los Angeles has been granted approximately $1 million in JTPA IIA discretionary funding from the State to administer a Vocational Education Program. These funds will be contracted out to Local Educational Agencies (LEAs) for the improvement of educational and training activities, vocational services, and related services to eligible participants enrolled in the JTPA IIA Program. These funds are to supplement existing programs and require a 100% match of funds from the LEAs.

Program services to be provided under this discretionary grant include the following:

- competency-based learning
- vocational assessment
- basic remedial education
- job specific training
- job development, placement and follow-up
- counseling and guidance

This program will serve eligible participants during the program year ending June 30, 1984.

JTPA IIA Discretionary Older Worker Grant

Los Angeles County has obtained a discretionary JTPA IIA grant in the amount of $.5 million to serve older workers. This grant is to augment existing JTPA training activities for older workers and is distinctive in that the particular employment and training needs of workers aged 55 and over will be addressed. Emphasis will be placed on removing traditional employment barriers for this group. Efforts will also focus on providing a network of support services through established inter-agency linkages at no cost to participants. Formal coordination has been developed with the Department of Senior Citizens Affairs in the development and implementation of this grant.

Under this grant, the County will serve approximately 140 older worker participants. Services will be provided to participants through contracts with private community-based agencies with a demonstrated capacity to serve older workers.

JTPA IIB Summer Youth Employment Program

The County will receive approximately $8.5 million to provide thousands of youth with employment and training services during the 1984 summer vacation (June through September). The goal of the program is to offer youth experiences in the world of work in a variety of occupational areas and to assist youth to remain in or return to school. Services to youth will be provided through contracts with private community-based organizations.

In the past, the County's Summer Youth Employment Program has emphasized direct work experience and guided vocational explorational activities. Although guidelines have not been received from the State for the 1984 summer program, the County intends to continue with this general program emphasis.

Attachment B

COUNTY OF LOS ANGELES 1983-84
GENERAL FUND FINANCED EMPLOYMENT AND TRAINING PROGRAM
FOR FORMER GENERAL RELIEF RECIPIENTS

In July of 1983, the Los Angeles County Board of Supervisors voted to implement an Employment and Training Program, as an alternative to welfare, for employable General Relief recipients. This program is administered for the County by the Department of Community Services.

The Board of Supervisors established and funded the Employment and Training Program in an effort to break the cycle of welfare dependency. The program offers employable General Relief recipients the opportunity to gain employability skills which are lacking in this most severely disadvantaged population. As an alternative to welfare, the program provides an opportunity for participants to work toward permanent economic self-sufficiency.

There are approximately 13,000 former General Relief recipients in the County funded Employment and Training Program. In order to provide training and stipends during the training period for these participants, the Board of Supervisors has allocated approximately $15 million to the program.

General Relief recipients are single adults who apply to the County Department of Public Social Services for welfare, indicating that they are unemployed and have no other financial resources. Prior to the County's Employment and Training Program, persons eligible for General Relief, even if able bodied, would enter the County's welfare rolls. Since the program began in October, the Department of Public Social Services has continued to determine eligibility for General Relief, but if the applicant is employable, has referred the applicant to the Employment and Training Program. Persons in the County's Employment and Training Program receive a stipend and other benefits and in return are expected to meet the program requirements for participation in employment and training activities.

When program participants, persons who would otherwise be on General Relief, enter the Employment and Training Program they are assessed and placed in one of a variety of program components. These components are described below:

1. Job Placement

   The program has a job placement component to match job ready participants with jobs in the private sector. This job placement effort is based on an in-depth assessment of participants conducted by departmental staff during job readiness workshops. Appropriate participants also receive counseling on preparation for job interviews and other support services.

2. Remedial Education

   The experience with former General Relief recipients this year has validated the expectation that many would need basic remedial education before they could reasonably compete in the labor market. Therefore, the department recommended, and the Board approved, a $1.5 million contract with the Los Angeles Unified School District for 3,000 slots to provide remedial education services for more than 6,000 participants. The participants in this program are all required to be involved in at least one other program component.

3. English as a Second Language (ESL)

In addition to the remedial education contract, the County has contracted for 300 slots to provide English as a Second Language (ESL) services to more than 450 General Relief recipients. The intent of this program is to provide the basic English skills necessary to apply for a job, understand and respond to instructions, etc. Persons in this program component are also required to participate in activities in at least one other program component.

4. Work Experience

This program component is designed to develop good work habits by the participants, many of whom have never been employed. Under Work Experience, participants learn to report to work punctually, take supervision, behave appropriately at the work site and complete tasks in cooperation with other participants. Work Experience is conducted at work sites such as beaches, parks, hospitals, etc., and participants are supervised and trained by public employees. This component also benefits the public in that the program participants provide needed services which would not otherwise be available.

5. Targeted Job Search

All participants are required to undertake job search activities and to verify their efforts to obtain employment.

While in the program, participants receive a stipend equal to what they would have received as a welfare subsidy. They also have the same access to medical care, Food Stamp eligibility, funds for transportation, and other benefits.

Mr. **Hawkins**. Mr. Hufford, I notice that Supervisor Edelman is in the room, so let us proceed to hear from him, and then we'll question you.

Would you remain seated at the table.

Supervisor Edelman, we certainly welcome you. In a way, this is a return for you to one of your earlier activities. I recall the time when you were a staff member of the House Education and Labor Committee. We welcome you, certainly, and the promotion which you have received over the years. We certainly look forward to your testimony.

The testimony will be entered in the record in its entirety at this point, but you may proceed to deal with it as you so desire.

STATEMENT OF EDMUND D. EDELMAN, LOS ANGELES COUNTY BOARD OF SUPERVISORS

Mr. **Edelman**. Thank you, Mr. Chairman, and members of the committee. I appreciate the opportunity to be here this morning to present my views about the job training program that has been mixed with a general relief program in this county.

In my judgment, this program was set up without adequate and careful review of its implications. It was set up to save money. That is, to take Federal JTPA funds, use them in place of general relief funds, so it was set up to save money. That's not bad. It's wonderful if we can save money in this time of limited resources, but I think we have to look through the implications and the consequences of this program to the people in the county who, one, are on general relief, or, two, want job training.

First, I'd like to say that the program has failed. I appreciate Harry Hufford's defense of it. He's a fine chief administrative officer. He represents the majority of the board of supervisors and does a good job at that. But I must say that the program is a failure. The program is a failure because, one, it has resulted in hardship for general relief people who are unable to get their checks. They have to stand in long lines. This is documented. I'm sure you've seen the reports and the paper that it's caused a hardship. People have had to move from the DPSS department into the department of community services that handle job training because what we have done is we've said, "To get your general relief check, you have to go to job training."

Now I'm not against giving general relief people job training. God knows they need it. They could benefit from it, but I'm against forcing them into job training at the peril of losing their general relief checks. What we're saying to them is, "Unless you report to a specific place for job training, you're not going to get general relief anymore." Many of these people are not able to receive job training. They have emotional, physical, and mental problems, even though they're designated as employable. If they were employable, they'd be out working. They'd be out holding a job, but they can't. But we're saying, "You must, at peril of losing your general relief, report to job training."

Now the people that would benefit from job training would be those people who would want training. We have programs in the county now. We have the East Los Angeles Training Center where we take general relief people who want to be trained and we give them opportunities to be trained on the job. We do that in conjunction with the Los Angeles City schools, and we have a wonderful program. It's working beautifully and we've kept it in place, and it's working. We train people who want to be trained. But to force people into training who don't want training is to take the sparse funds that are available for training and putting them into a group of people that are not going to be trained, and we then have left out other people who could be trained. Let me give you some examples.

When this program came down, it was required that any provider give first priority to general relief. You had to be on general relief for a provider to give you training. Now there are many people in my area that aren't on general relief. They are on AFDC, they meet other qualifications for these funds but they're not on general relief, so they couldn't get any training. They couldn't get any training even though they wanted to. The providers were told, "You can't give any training unless people are on general relief." So a lot of people in this county who wanted training, who could benefit from training, weren't given the training. That was one problem.

The second problem was that many of these providers, under the old CETA programs, were able to train particular ethnic groups. For example, in my area, I have Asian providers that are able to take the Indo-Chinese who were coming to this country and others who have particular language or cultural problems, and give them training so they could get off welfare. We have Spanish-speaking providers that are able to take their skills of training people in that area and give them training. That could no longer be done because people were sent to these providers who were unable to handle the kind of training that these providers had provided before and that was working very well.

Then, as I said, we have made it difficult for AFDC and other people who need and want training to get training.

So I say this program is a failure. One, it hasn't saved the money that was set out to be saved. It was supposed to save $4 million. It was told to the board of supervisors, "This would save $4 million of general relief funds because we can use Federal training funds." It hasn't saved that. In fact, it has cost the county over $12 million. We just had to make a budget adjustment about 2 weeks ago to put more money into the general relief because this program had not succeeded.

We should, in my judgment, end this program. I've tried to end it quickly. Unfortunately, I could not get the support of my colleagues to end it. We're not saying we don't want to train general relief people. Yes, we want to train those general relief people who want training, not to force people into training that can't handle it, don't want it and are not going to benefit from it because you're just then taking the Federal funds, you're not getting the success rate of placement that you should have, and we're wasting these funds in my judgment. We're not saving any general relief funds. So we should return general relief to the DPSS department. They do a good job. They know how to handle these people and allow the department of community services to continue the handling of job training funds. We shouldn't mix the two. That's what we've done. I think it has been a program that has failed. We ought to recognize that. We ought to pull out of it, and we ought to do it very quickly so that we can get on to use the precious few dollars in job training where they can do the most effective good. They can train people who want to be trained. It doesn't make sense to train somebody when they're just going there to pick up a check. If they don't really want to hold down a job, it makes literally no sense at all.

I appreciate the opportunity to express my views to the committee. I know that you are concerned. The chairman has had a long record of concern, a pioneer in job training programs. I remember, as the chairman said, I was working for a subcommittee of Education and Labor when job training was just beginning in the 1960's. And the chairman has done an outstanding job, provided great leadership in this area, and we appreciate that. We're very proud to have a ranking member of the Education and Labor Committee from Los Angeles who does such good work. I know the other members have outstanding records also. I'm sure this committee will benefit from these hearings, and we appreciate your being here to hear some of our problems.

Thank you. I'd be happy to answer any questions.

[Prepared statement of Edmund D. Edelman follows:]

PREPARED STATEMENT OF EDMUND D. EDELMAN, SUPERVISOR, LOS ANGELES COUNTY BOARD OF SUPERVISORS

Good morning. My name is Edmund D. Edelman, and I am a Supervisor representing the Third District of Los Angeles County.

I am here to give you an overview of the facts that have led me to conclude that my colleagues on the Board of Supervisors erred when they implemented a program by which Federal job training [JTPA] dollars were earmarked to offset county welfare (General Relief) costs.

This policy has taken two worthwhile programs—welfare for some 36,000 county residents who cannot support themselves, but do not qualify for State and Federal welfare; and Federal support for the training and retraining of men and women who find themselves out of work—and combined them in a way that has made both programs ineffective.

Because of this policy, job training under JTPA is not being provided to women with dependent children, minorities, disabled persons and displaced or laid-off workers, simply because they do not receive General Relief. Meanwhile, General Relief recipients are being compelled to attend job training courses, regardless of whether they are motivated to get that training, or are physically or mentally capable of taking advantage of it.

Last August, the Board of Supervisors established a policy to use JTPA dollars to offset the rising costs of General Relief. The Board was told this plan would save the county some $4.0 million during the 1983–84 fiscal year.

Now, I am all for saving the taxpayers' dollars and encouraging employable welfare recipients to become self-sufficient, but I questioned whether this plan was workable, and voted against it.

The optimistic savings estimates were based on a small pilot program in which AFDC-U family members and General Relief recipients were put into a compulsory training program. It did not seem feasible to me that the majority of General Relief recipients could benefit from this type of job training, nor did the idea of having job-training providers essentially administer a welfare program seem workable.

The Chief Administrative Office estimated that there would be just 4,700 participants per month in this program. It has turned out that we are now averaging more than 15,000 participants per month. Administratively, these cases, formerly handled by the Department of Public Social [DPSS], were shifted to the Department of Community Services, an agency unprepared to handle the problems of welfare recipients.

County community service centers were turned into locations for General Relief recipients to pick up their monthly checks. This created tremendous confusion, long lines outside these centers, and disruptions of the worthwhile activities these centers are designed to perform.

Moreover, the implementation of this program was, overall, a bureaucratic mess. Agencies designed to handle specific training and cultural needs were given inappropriate referrals. English-speaking residents of south-central Los Angeles were sent to programs whose purpose is to teach newly arrived Asian immigrants how to speak English. East Los Angeles General Relief recipients are ordered to attend classes far away from their homes, requiring two or three bus transfers, while job training centers in the East Los Angeles area are assigned clients from other distant locations.

I cite as an example the experience of the United Chinese Restaurants Association. For many years, they have provided an extremely useful service to Los Angeles County as a job training and placement agency specializing in disadvantaged Asian clients, especially recent arrivals to the United States.

Because of the change in policy, the Association has had to completely revise its program to serve General Relief recipients. According to the program's executive director, many of these clients come to job training classes erratically, only on days when checks are to be distributed, or under the influence of alcohol or narcotics. It is clear to the instructors that these clients need social services, medical attention or therapy, not job training.

The letter I received from that program's director, Chih Hsing Pei, also describes how the policy change has harmed her valuable agency in a financial way. Ms. Pei states:

"It is nearly impossible for us to operate the JTPA program under current (Community Services Department) guidelines and budgetary restraints. Before this fiscal year there were agencies which spent up to $7,000 to train and place an individual, now we are asked to do the same plus motivate and provide counseling to these clients for one fifth of the cost. The massive dumping of (General Relief) recipients on agencies like ours is a gross injustice and an ill-advised tactic aimed at reducing the County's burden that simply will not work. It took many years of hard work to establish the rapport and positive relations with the private sector companies which hire our graduates. With the drastic changes in our program and the deterioration in the quality of our trainees, we fear that what we've built up with the private sector will be seriously jeopardized, ultimately causing a negative impact upon our performance."

Finally, when you get to the bottom line, you find out that all the confusion, dislocation, and anguish caused by this program has not saved taxpayers one dime. Instead of saving the county $4.0 million as predicted, the Chief Administrative Officer has come in recently with a projection that this program will exceed its budget by a whopping $14.1 million.

The issue of runaway welfare costs has to be addressed separately from the JTPA program. In large part, it is the national and local economy that is responsible for the size of Los Angeles County's General Relief rolls, and this is an issue not within the purview of this hearing today.

The Department of Public Social Services has traditionally offered work experience training to those General Relief recipients who are employable, which takes into account their special needs. Under a reformed program for using JTPA funds, we could certainly offer job training to General Relief recipients on a voluntary basis. According to some experts in the job training field, a voluntary program would result in actual jobs for about the same percentage of General Relief recipients as a compulsory program—about 10 percent.

By opening up the JTPA program to any qualified persons who want and need to develop new, marketable skills, the intent of the Federal government when it created JTPA would be fulfilled. Under the current system, however, Los Angeles County is wasting precious Federal resources, and shutting the door on many men and women for whom this valuable job training program was created.

Thank you for allowing me to express my views.

Mr. **Hawkins**. Thank you, Supervisor. I'm quite sure there will be plenty of them.

I think you've indicated that the history of this committee has certainly, I think, indicated that, over a long period of time. We have supported certainly the training of individuals, including those on general relief for meaningful jobs. This act, when it was signed by the President, was described as a program that would—this is almost a direct quote—that would provide meaningful job opportunities in the private sector and that it would not be a quick fix type of job operation. Certainly this committee joined with him in looking forward to the implementation of that type of a policy.

The concern that we have expressed, I think, is that the dumping of local relief recipients onto a training program of this character may violate the intent of Congress in passing the act. We are concerned as I think Mr. Hufford indicated in his statement as well, about the board of supervisors' policy of providing a training opportunity for general relief recipients.

Mr. HUFFORD. Yes, sir.

Mr. HAWKINS. Well, I don't know of anyone who criticizes you for that. That is not the criticism. I think that is a misunderstanding of what this hearing is all about.

We are not here to get into how you expend county moneys. If you want to do that, if you want to provide training opportunities for general relief recipients, as a county taxpayer, I am pleased to applaud you and support you in every way. But this is not a county program. It is a Federal program with Federal moneys designed to accomplish a specific objective. That objective is to take what we call the economically disadvantaged individuals, which include a lot more than those who are on general relief, and to give all of them an equal break at a job opportunity at the end of the training.

But to the extent that you do have other county programs, we would hope that you use the county money to do that and not the Federal money because that is intended for a completely different operation. As a matter of fact, section 141(b) of the Job Training Partnership Act says that, "Funds provided under this Act shall only be used for activities which are in addition"—and I emphasize the words in addition—"to those which would otherwise be available in the area of the absence of such funds."

So what we have, first of all, is a conflict. When you substitute Federal money for county money, when you have other opportunities to do it on your own, this program was intended to be in addition to your county program. I assume you do have a county program to train other persons. We would certainly hope that that intent of the act would be carried out and not get into the problem of substitution.

People across this country bad-mouthed CETA because they said we were merely substituting Federal money for local money and that everything was wrong with CETA. Well, we see the same thing happening under this program.

Also, under the definition of "economically disadvantaged," we certainly include a large group of people—and I will not read the parts of the act which apply there—but what we are talking about is everyone whose income is 70 percent of the lower living standard income level or is at or below the poverty level. We assume that a lot of people—in Los Angeles County—and I know there are a lot in my district, for one reason or another, do not apply for general relief.

I'm just throwing this out because we'd like to get some clarification. We're wondering whether or not, under the JTPA program, other individuals are going to be served adequately as well as general relief clients.

I have some documents here. I don't know whether you'll recognize them or not. Are these roughly the documents that all those who apply for general relief are required to fill out?

Mr. **Hufford**. Mr. Chairman, these are certainly department of public social services forms, and the social worker who would interview the client would have to see to it that this information is taken and put into the file, yes, sir.

Mr. **Hawkins**. Well, I went through it yesterday because I also went through some other forms that I had to fill out myself in the county. It happened to be several pages. I won't refer to them by their name at this time. But, if I had to stand in line maybe all day to try to the system, I think I would flunk filling out the forms if I was so unfortunate as to be applying for relief in this county. I can't see how in the world individuals applying for county relief can understand the forms. I think they'd make a dozen mistakes. So it isn't an easy thing to get on public relief, I assume. There are many individuals who do not apply for relief.

Now would an individual who does not apply for general relief be able to get on the Job Training Partnership Act program in this county?

Mr. **Hufford**. Yes, sir, not through the general relief program. There are other people who are qualified for the Job Training Partnership Act program.

Mr. **Hawkins**. What program would they go through?

Mr. **Hufford**. Well, the summer youth program——

Mr. **Hawkins**. I'm not talking about the summer youth program. I'm talking about those who are looking for full-time, unsubsidized jobs in the job market, which is what the Job Training Partnership Act is all about. As the President says, it's for unsubsidized jobs in the private sector.

Let's say you have such individuals looking for those jobs, would they be able to get those jobs under the county program as it relates to JTPA?

Mr. **Hufford**. Well, as I've indicated in my testimony, 35.4 percent of our funding is being used for general relief recipients. The balance is being used for nongeneral relief adults, youth, and the administrative costs related. So there are funds available for non-GR in our JTPA program, but it's true that our primary focus in the county program has been for the GR referral. Of course, county-wide, not including Los Angeles County, the statistics change dramatically because other agencies are not talking general relief recipients. They're reaching this unemployable group that you're describing.

Mr. **Hawkins**. Well, we make those broad statements, but we still don't get any specific place where such individuals can go.

Let's say that I'm at a meeting in my district and there are individuals in the audience who say, "We are looking, Mr. Congressman, for those jobs that we understand the President says are available, and many individuals in public office are saying we have recovery. We want to know where to go to get those jobs and how to get training for those jobs." Where would they go? Would they be able to participate in the JTPA program in this county or do you have any other recommendations for those individuals? Let's say they are not on general relief and let's say they're veterans, elderly people, or head of families, but for one reason or another, they have not seen fit to apply for general relief, and they are looking for opportunities. Where would those individuals go?

Mr. **Hufford**. They would have to look, I guess, to us for the extent of resources available or to other agencies that are making this training available through JTPA funding.

I cannot give you a specific answer. I don't have the detailed knowledge myself to answer your question more accurately than that. I can look over my shoulder and maybe get some help, if you'll permit me to do that.

Mr. **Hawkins**. You see, such answers would not be satisfactory to my constitutuents in my district.

Mr. **Hufford**. Mr. Chairman, within the county program approximately 20 to 25 percent of the slots can be made available to non-GR recipients. They tend to be in the suburban areas and not in the central core of the community.

Mr. **Dymally**. Jim, if I may.

Let's take Compton, the most depressed of all the cities in the county. They did not develop a consortium of their own. They are in the county plan.

What would happen to an average unemployed person who was not on relief, AFDC, or any benefit program? Where would that person go considering the fact that Compton is in the county program and doesn't have a program of its own?

Mr. **Hufford**. In this case, the way the allocation of slots has occurred, the GR referrals would take priority. There would not be slots available for non-GR residents of Compton.

Mr. **Dymally**. The chairman was stating that these are the questions that every weekend or every month that we come home we must answer for those able-bodied men and women who do not want benefit payment programs but want jobs. They say, "What about the program that the President spoke about in the White House?" In fact, the President, as he always does, took great credit for this program by bringing some black youth from Washington into the White House and announcing it was a jobs program, not a training program. We find now in Los Angeles County it is a welfare recipient program. So those cities like—I want to emphasize Compton again because of the uniqueness of Compton's depressed economy—don't have a ghost of a chance. The people in those cities have no place to go, if they're in the county consortium.

Mr **Hufford**. I can't argue that. With the demand and the resource, we can't meet the demand.

Mr. **Dymally**. Thank you, Mr. Chairman.

Mr. **Hawkins**. Mr. Hufford, may I ask, for the sake of the record, how many SDA's are there in this county?

Mr. **Galloway**. There are eight.

Mr. **Hawkins**. Mr. Galloway has just joined the witnesses. Feel free to interpose at any particular point.

Mr. **Galloway**. Thank you.

Mr. **Hawkins**. How many SDA's are in the country?

Mr. **Galloway**. There are eight.

Mr. **Hawkins**. There are eight?

Mr. **Galloway**. Yes, sir.

Mr. **Hawkins**. Are those individuals being served on the county program that we are referring to this morning, are they outside of the SDA area, or do you serve them countywide?

Mr. **Galloway**. The county service delivery area extends into a number of the cities as well as the unincorporated territory. We have no influence over the service delivery area activities of any of the other areas, obviously.

The problem that we would have in the assignment of people into our slots is the artificial boundaries that are created by the service delivery areas. They are not consistent with our supervisorial boundaries. So, Supervisor Edelman, for example, and Supervisor Hahn, as another example, have a large part of their area which is covered by the city of Los Angeles. They have chosen not to serve general relief recipients in their programs, and I think that's very unfortunate. The limited amount of money that is available at the present time, which as you know very well, Congressman Hawkins, has dropped from over $135 million in about 6 years down to the county service delivery area's present allocation of something in the neighborhood of $30 million. That amount simply cannot accommodate the numbers of people that want to be trained, and that was the point that Congressman Dymally was making about the city of Compton's large training need. We have a large number of general relief recipients who are also residents of the city of Compton. The people are served only in their place of residence. We don't bring people in from outside, so they are residents of the city of Compton. But, in serving those people, it does mean that there are many other people there—far more people than we would ever be able to serve. And certainly under the restricted allocations that are available at the present time, we are able to serve only a very small percentage of the people in this County who need job training.

Mr. **Hawkins**. Well, that's the point. Are you, in the Los Angeles County SDA, serving individuals outside of the area?

Mr. **Galloway**. Yes; our plan calls for service of approximately 30 percent outside of our service delivery area. We have accommodated that to a certain extent by adding almost $1¾ million of the county's general relief fund money to the JTPA allocation. I don't know that that point has been made here. We've talked about dedicating Federal money to serve a general relief target group, but, at the same time, the county has added almost $2 million of county general fund money to put back into the JTPA program to pay stipends and pay some training costs for people in that program. So it is not going totally out of the program, which I think has been part of the direction.

Mr. **Hawkins**. I was trying to find out whether or not, contrary to the law, you are, as a matter of general practice, serving individuals outside of your actual area because the law certainly does not encourage that. In fact, it discourages it.

Mr. **Galloway**. It does provide that the county should seek a waiver and have discussions with other service delivery areas which we have done and which we are in the process of doing. Our State plan does include that characteristic and has been approved, and we are in the process of satisfying the State plan now.

Mr. Hawkins. Now that is where we get into many difficulties because so many of the things that are being criticized are explained by "we are in the process of doing something," which the law has already required to be done. We assumed the State had approved the original plan in conjunction with the Private Industry Council. Apparently, however, many of these things have not been finalized and that certain liberties with respect to requirements have been taken that give the impression, obviously, that this has become another welfare program.

Mr. Galloway. Well, I think that's an unfortunate occurrence because that's not the case at all. I agree with your comment that we certainly need to comply with the State plan, which we are in the process of doing.

We have a long list of requirements that we must meet in that State plan and it takes us a full year to meet them. We are in the process of achieving those. Those are in the form of goals which are required in the State plan. They are all spelled out very carefully in the State plan. The goals have been approved. The effort now is to satisfy those goals. As a part of that, we indicated that we would be serving a portion of people outside of our service delivery area. We are within that figure. We are well within that figure. But that is a matter of record. As far as we are concerned, since it has been approved, it's acceptable.

Mr. Hawkins. Well, if it is approved, it certainly was not the intent of Congress that it would be given general approval.

Mr. Galloway. I understand that.

Mr. Hawkins. It's the intent of Congress that we go back to that because that's what we thought we were doing when we passed the law.

Mr. Galloway. Yes.

Mr. Hawkins. And to simply get a lot of waivers and to go afield of the original intent is, in my opinion, going to give you trouble down the road because the act, in a sense, said that, "We want you to reach a particular goal within, let's say, a year's time. Now we don't care how you do it, but we want to see you there at the end of the year." The Department of Labor issued performance standards, and I would say that, at the end of the year at the current trend, this county is going to have a very poor performance record because you're not going to get people into full-time permanent private sector jobs such as the type the President speaks of over TV. What you're going to have is you're going to have a very low placement record. You have a lot of individuals.

Now, in dealing with general relief clients, I go back to what Supervisor Edelman says, that you have people with a lot of problems. Employment is one of their problems, but they also have other problems. Supportive services certainly must be provided. To do all of these things and to train them for dead-end, menial, low-paying jobs was not the intent of the act. I think that certainly is contrary to what has been said by everyone in authority, including the President himself.

Mr. Galloway. Well, Congressman, that's true. We all agree with that. I think that a little different examination of the programs that we're operating, though, leads you into a different conclusion. We are running two separate kinds of programs. One is funded completely out of county general funds. In that program, we are providing basic remedial education for people who can't read, who can't write. We are providing English as a second language for people who have difficulty speaking English. We are providing very basic work experience programs. We are providing preparation for interviews for just simply going out and meeting potential employers. We are developing ways in which potential employees can meet employers. We have targeted job search programs. Every person who comes into that program goes through an assessment. On the basis of that assessment, they are put into one of these particular program areas.

Now, as the person indicates or demonstrates that they have a potential for benefiting from skilled training, which is what you're talking about and which is a very important part of the JTPA program, those people are moved into JTPA slots as they are vacant, and those are the general relief recipients who are in the JTPA program. They are the ones that we believe and that the contractors believe can best benefit from the JTPA skill training. But they are different programs and it's very unfortunate in the description of these that they get tangled up, but they are funded separately. The emphasis is separate and the direction of the programs is different. We link them together because we want to try to move people from the basic preparation programs, which so many of our general relief people need and which the supervisor is absolutely correct; it's a very important consideration, over to the skills program which are funded separately. So, I regret that they keep getting tangled up, but they do.

Now in the JTPA program, we have always met our goals in this county. We have never had a problem in meeting our goals. We have had a demonstration project in the past year, concentrating on general relief recipients, and we were very successful. Sixty-seven percent of those people—using the CETA guidelines—were terminated successfully, positive terminations, 67 percent; very high. I don't know that you're going to find that with any comparable population anywhere else in the country.

We took that same approach into the program that we have now. We are requiring that contractors place people at the conclusion of the training or they don't get paid.

Now the indications that we've had at this point is a very decent success rate in placements. We are probably going to exceed the goal that the county has in its plan. We are very optimistic about that.

So I share your concern, Congressman, but I think that the record at the end of the year is going to be more than satisfactory in the JTPA program.

Mr. HAWKINS. Let me yield to Mr. Martinez.

Mr. MARTINEZ. The program you were just talking about with such confidence in what the county is being able to accomplish with these general welfare recipients who need some prior training or education—education, I think, is the word you used—before they go to the JTPA program.

Mr. GALLOWAY. Right.

Mr. MARTINEZ. Let me read to you from a newspaper article. The article is somewhat confusing after hearing your comments.

> At the Chinatown Service Center, directors of a job training program specializing in teaching Asian refugees to speak English were puzzled when the Los Angeles County sent 20 unemployed blacks to this Chinese-English translator. The Asian refugees, meanwhile, had been sent to another training center run by the county superintendent of schools where none of the instructors could speak their language. These people were waiting around, not learning a damn thing—and it's his terminology—said an exasperated Jensen Ming, the Chinatown project manager.
>
> Across town, the directors of the San Fernando Valley Job Training Center set up to help unemployed women were actually puzzled when their applicants, six of the nine, were men.

This is the targeting that you're talking about doing.

It goes on to cite many instances of that particular program and how confused it is to the people that are trying to run it. Yet I just heard you say, with the utmost confidence, how this is going to really make this program successful by the end of the year.

Mr. GALLOWAY. I don't know what the newspaper article is. The incident that you are referring to, to some extent, did occur.

Mr. MARTINEZ. It's a Times article by Leo Wolenski.

Mr. GALLOWAY. Yes.

Mr. HAWKINS. Could I interrupt? I understand the board of supervisors meets at 10 o'clock. Mr. Edelman, we have your statement and we certainly will have a continuing communication with you and the other members of the board of supervisors.

I was asking Mr. Martinez if he would like to ask a question of Mr. Edelman, and then we will excuse you.

Mr. MARTINEZ. I certainly would because I share your same alarm. When somebody does something in mass force and without any evaluation of those people and their qualifications for a particular program—what I understood you to say was that it was, "Go or you don't receive a check." Especially in the area of aid to families with dependent children. I'd like you to respond to that in just a little bit more detail.

Mr. EDELMAN. Well, I think in my district, which was alluded to, and Mr. Hahn's district—and I think this should be expanded upon a little bit by Mr. Galloway and Mr. Hufford—we've had difficulties from people who are on AFDC getting a job training slot in the area that I represent, or that Mr. Hahn represents, because all the slots are being utilized by general relief people. In the urban area, my district, the 3d, and Mr. Hahn's district, most of the slots, if not all, for job training are being taken up by general relief recipients.

Am I correct, Mr. Galloway?

Mr. GALLOWAY. Correct.

Mr. EDELMAN. And, therefore, a woman who is anxious and would benefit from training and has a family to support, can't get that training experience and may not get the job. She will have to stays on AFDC, which is a cost to the Federal Government and to us. Instead, the training funds that could be used for her are being, in my judgment, squandered into trying to train people that may not be motivated for training or able to handle training and won't benefit from training. So the limited dollars are not going to the right group is what I'm saying.

In the urban area, we've had to turn away providers. They've come to me—some in the area that you represent; I'm sure you've heard from them. They can't handle the people from the area. They have to send them outside. They can't get training. So it's been a very damaging program from all points of view, from providers, from people who want training, from saving money. I say it's a failure and I think the county should put a halt to it right away. Unfortunately, we haven't had that, although there's been some. There's a board agenda item today that is supposed to stop it for a while. Maybe Mr. Hufford wants to talk to you more about that. I'm not here to ask questions, but I think you should find out why people, who are not on general relief, in the urban area that I represent and Mr. Hahn represents can't get job training who are not on general relief.

Mr. **Martinez**. Mr. Edelman, I'd like Mr. Hufford to respond to that. But before you leave, I'd like to ask you just one more thing. Maybe you can clarify some confusion.

I read a statement where there were 9,000 slots allocated to Los Angeles County but that there were 12,000 general welfare recipients referred to that program. And yet I heard Mr. Hufford say that only 34 percent of the JTPA money is being used for general welfare. That seems like an inconsistent statement and one or the other is not true.

Mr. **Edelman**. Well, it's confusing. If you look on attachment I, which is on Mr. Hufford's last page or next to the last page, you will see the 1983-84 Job Training Partnership Act. You can see that, for the county area, some $12 million of funds have been available. Of the $12 million for adults now, $4.5 million has been used for general relief and only $1.5 million for other participants. Is that right? I'm reading from your figures. So that doesn't square because I think what they are talking about is lumping in youth and other groups into the funds that are eligible for nongeneral relief. I think if you just look at adults, the adults are getting $1.5 million out of the $7 million—these are for adults who are nongeneral relief. They are getting a lot less than 30 percent—it doesn't even look like 50 percent; $1.5 million of the $7 million—it's less than, what, one-seventh, maybe one-sixth. So they are getting only 20 percent. And the general relief is getting more than half, 40 percent. So I think these figures are right from the CAO or from the department of community services, and they cast a shadow on how our funds are being used. We're using this as a general relief bailout program, general relief bailout. I don't think that's what Congress intended. I don't think that's what the public wants. We should handle general relief separately and not force general relief. You ought to ask about this mandatory requirement that we're telling people, "You must go to job training or you're going to lose your general relief." That may be beyond the purview of this committee, but I think that that smacks of forcing people into training that can't benefit from training or who don't want training. You're wasting the Federal dollars.

Mr. **Dymally**. Just a quick question. Did this program conception come from the CAO or from the majority of the supervisors?

Mr. **Hufford**. I think I should speak out. It came off a board letter I submitted to the board. The board voted for it, but I think it's something that was submitted by me and the other department heads of the county.

Mr. **GALLOWAY**. It's a recommendation based on material that we submitted as the result of the pilot program that I talked about earlier. Mr. Hufford and I presented that to——

Mr. **EDELMAN**. Mr. Chairman, I have to leave.

Mr. **HAWKINS**. Thank you.

In connection with the chart on attachment I just referred to, I guess that's the amount, $4.5 million——

Mr. **HUFFORD**. Millions of dollars, yes. The chart is in millions of dollars and then the percentages at the bottom are the basis for my testimony.

Mr. **HAWKINS**. Yes; we estimate that it's roughly about $690 per participant for training. Is that about correct?

Mr. **GALLOWAY**. No; the slot cost in the JTPA program—it would be approximately $1,700 per person in the JTPA program, approximately.

Mr. **HAWKINS**. Well, under the county plan, it says, "For the adult program, the average cost per participant will be a low of $630 to a high of $770."

Mr. **GALLOWAY**. Well I'm not sure what that is.

Mr. **HAWKINS**. That's in the county plan as submitted to the State's employment development department [EDD]. Are you familiar with it?

Mr. **GALLOWAY**. Yes; but I don't know the context——

Mr. **HAWKINS**. That was in the submission to EDD; that's where we pick it up. That is the cost per participant.

Mr. **GALLOWAY**. I don't know if that's all categories or if it's title IIA.

The contracts that we've negotiated with our service providers call for a contract expenditure of the average of somewhere in the neighborhood of $1,700 per person.

Mr. **HAWKINS**. For the training aspect of it?

Mr. **GALLOWAY**. Yes; for the total cost of the program.

Mr. **HAWKINS**. The only thing we can go by is the plan which was submitted which I assume was approved by the State.

Mr. **GALLOWAY**. Yes; our plan is, as always, subject to modification. We have a modification pending with the State.

Mr. **HAWKINS**. You have to realize that all the relevant factors were included in the plan. That was the reason for requiring a plan, so we could take the plan, look at the plan, and see whether the plan meets the Federal requirements. On that basis, judge whether or not the plan is substantively correct and the basis on which the performance will eventually be judged.

Mr. **HUFFORD**. This is in a submittal——

Mr. **HAWKINS**. You've modified it since that time; we have no notice of any modification.

Mr. **GALLOWAY**. There is a modification pending, but the instructions have not been made available at this point and will not be made available until the 15th of March.

Mr. **HAWKINS**. What you're saying now is that approximately $1,700 will be the average cost.

Mr. **GALLOWAY**. Yes. These are more nearly correct.

Congressman, I'm not sure that I can respond to that particular issue at this time, and the youth program is right below that. Those contract costs are more nearly representing what we have.

The others I'd have to read back through this now to get that figure for you now. I don't know if that's the total cost of a participant in all categories or if that's just the contract cost for the title II program.

Mr. **Hawkins**. Would you submit to the committee any modifications you've made or, if there are any corrections in the plan which are to be made, let us have the benefit of them so we can be better acquainted with what the plan is doing.

Mr. **Galloway**. When the plan was submitted, as the panel is aware, we were still in the process of having hearings at the State level on the nature of the service delivery areas. In the course of that, there were service delivery areas created that were not contemplated at the time we had been preparing our document. Since then we've had to modify our plan and there are instructions coming to us—they have not been made available to the State yet—but there are instructions coming which will deal with that modification.

Mr. **Hawkins**. I think Mr. Martinez was asking a question prior to the time Supervisor Edelman spoke.

Did you get an answer to your question?

Mr. **Martinez**. No.

Mr. **Galloway**. Was that in relation to the numbers of people? I think he raised two questions. One, the numbers of people, and then the misreferrals that were made of people erroneously.

Mr. **Martinez**. Right.

Mr. **Galloway**. There were misreferrals that were made.

Mr. **Martinez**. Let me back up just a little.

Part of the whole question to Mr. Edelman was the area of mandating without evaluation. Mandating that everyone in the general relief program——

Mr. **Galloway**. Yes; let me explain how the process works because there are three different situations which you've raised there.

First, there has always been a requirement in the general relief program for the county. It has nothing to do with our work and training programs operated in any other department, but the general relief program has always required that an employable person accept any employment offer that's made or any training offer that's made that leads to employment. That's a standing requirement. It's been there for many, many years. So there's nothing that we have added to that for these particular programs.

We simply are picking up a person from the department of public social service who has been determined to be eligible—most of that determination is made on the person's own statement. They indicate that they are employable. So we do take those people in.

Now, then, once they get in, they are then put through an assessment process. On the basis of that assessment, they are assigned into a particular area for training or skills as the case may warrant.

Early in the program when we first started this, you raised a question about the numbers of people. We had anticipated in the planning of the program that there would be approximately 9,000 people that were referred to us from the department of public social services. I think, as Mr. Hufford pointed out to you earlier, the general relief population is one of the most volatile populations that we have anywhere. It is not a predictable population. We had set aside some extra money in our budget in the anticipation that the population might go up. We did not anticipate that it would go up as much as it did.

From the time that we had prepared our program and had entered into preliminary contract negotiations where we were anticipating approximately 9,000 people, that number went up to 14,000 people.

In the course of assigning those people to the various contractors, the volume of people coming in did cause misassignments to be made. There were people that went to contractors where it was not appropriate for them, either because they were running programs that were not particularly suitable to the person or they had highly specialized needs. We pulled those people back as quickly as we found them. As quickly as the contractor said to us, "I've got something wrong here," we pulled those people back and they were reassigned into the correct program areas. Now that has been done. So the assignments are correct at the present time. Now there may be somebody in a program that a contract agent doesn't feel is particularly useful but they have those—they've always had those and they have to deal with them. That's their responsibility.

The other issue is, as these people do come into these programs, we have found that, when they go into the skills program, our contractors are successful in placing them. They are trainable. Not all of them; certainly not. We know they're not. Many of them, as indicated earlier, can't read. They can't write. We have to spend an inordinate amount of time in our educational programs training people just to read and write, basic skills that they have to have in order to compete in any kind of job market.

When you look at what's happened to the educational programs with the cutbacks that continue to occur in there and the kinds of people that we find trying to get into the job market, there's absolute inconsistency. Then we see on the other hand these huge cutbacks that come year after year in the Federal training programs, and we're locked into large numbers of people that simply are not going to get training. If we put every penny of our money into training the AFDC mother, we would train only a tiny percentage of those that want and need training. There is simply not enough money there.

Mr. Hufford called for an increase in the funds that are available to us. These funds need to be increased dramatically. There is just simply no way that you can offer training for the numbers of people that require training with the dollars that are available.

Mr. DYMALLY. Mr. Galloway, that's essentially the point with JTPA. You are training more people than you have money.

Mr. GALLOWAY. Well, we hope we are training more people than we have money, but I understand your point.

Mr. DYMALLY. There are more eligible candidates that you have put into the program than you can actually afford to train.

Mr. GALLOWAY. Well, all of the people who are in the JTPA program are eligible people. Congressman Hawkins made a point earlier that there are not as many AFDC people in those programs as he would like to see and that's a fact. But that comes back to the availability of the total dollars. We don't have ineligible people in our program. They are all eligible.

Mr. DYMALLY. How many people now are under training?

Mr. GALLOWAY. At the present time?

Mr. DYMALLY. In the county. Yes.

Mr. GALLOWAY. In our service delivery area, we have approximately 3,200 people in our JTPA training slots contract.

Mr. DYMALLY. Do you have jobs for them when the training is completed?

Mr. GALLOWAY. We only pay our contractors if they do place the people in jobs at the conclusion of the training.

Now I'm not saying that they will all get jobs. They won't. There's never been a program operated anywhere where they did, but there will be probably 35 percent of those people that do get on subsidized employment out of jobs.

Mr. DYMALLY. If they don't get jobs, would they be eligible for general relief again?

Mr. GALLOWAY. Yes; these people do not lose any money if they come into these programs. That's an important point, Congressman. I'm glad you mentioned that. In the programs that the county operates, a person who was eligible for general relief received a stipend. He also received health benefits and food stamps. A person who comes into our employment and training program continues to receive the stipend. He does not lose any money. He continues to be eligible for the food stamp benefits and for health care benefits. If a person is not successful in our program, we do not dump them back out onto the streets without any money. They continue in the training programs until we are able to help them or until they find employment or go someplace else. We are not making an effort to simply dump people. That's not our intention.

Mr. DYMALLY. The former chairman of the board, Mr. Terry, came by my office and painted a very optimistic picture of your program, which led me to suggest to him that he ought to talk with the staff. He did talk to the staff and gave the staff the impression that I too was enthusiastic. No; I was just trying to be objective.

Mr. GALLOWAY. We were hoping you would be enthusiastic, but we realize that you were being objective.

Mr. DYMALLY. Considering your enthusiasm, Mr. Hufford's enthusiasm, the three members of the board, and Mr. Terry, there are at least six people in the county supporting this program.

Why is it there is so much criticism of the program? Why are there so many lawsuits? Why are two supervisors and a number of people in job training so unhappy with the progress?

Mr. GALLOWAY. For different reasons. The two supervisors are unhappy because of the way in which the service delivery areas segment the county, the limited dollars that are available make it impossible for them to offer training opportunities to people who have not been on general relief. That's a serious problem and we are aware of it and we are trying to deal with it. We had hoped that we would be successful in getting some of the other service delivery areas to provide training opportunities for those general relief recipients who reside in their service delivery boundaries. We have not been successful in doing that. That forced the burden back on the county. So they do not like that.

Now I can't explain what goes through the minds of lawyers that persist in filing lawsuits on various points of our general relief program except that they have been very successful in forcing the program more and more away from employment and training and more and more back into a welfare model which I do not believe is productive in the long term.

Mr. **Hufford**. That's right.

Mr. **Dymally**. I appreciate the very forthright response to my question by the CAO. He is saying, in effect, that for some people there is no relief and, therefore, when I have my forum in Compton on Saturday, when I'm asked about this program, I should just say, "If you are not on benefit payments and seek entry, there are no opportunities for you."

Mr. **Galloway**. Well I would hope that you would add to that that you would then do whatever you can, as you have in the past so persuasively, to make available additional funds at the Federal level to expand those training opportunities. Congressman, it's almost ridiculous to say that to you, gentlemen, because you have been at the forefront of the effort to try to make funds available, so you're not the ones that we need to keep talking to. But the funds are the problem. The lack of funds that come to this county hurts these folks and we cannot provide the training programs that people need without those funds.

Mr. **Dymally**. One final observation.

I think that what was envisioned through the JTPA was something like your pilot project. You would have taken the JTPA money and taken a selected few people and you would have trained them rather than use the money for general relief. Therefore, you would have been able to target the money and give training to those people who would have been most able to go back into the job slot from which they came or something related very shortly.

Mr. **Galloway**. We've learned a lot from the experience we've had, and I think that the effort that Mr. Hufford was talking about earlier in trying to deal with some modifications in the program might very well put us back into that particular posture. We have far too many people in the two programs that we operate to deal with this problem successfully at this point in time. The board has reduced the intake into my programs by 50 percent. Mr. Hufford has recommended that that be deferred by the other 50 percent until such time as we can make sure that we have all of these contracts and all of these efforts in place. We are very conscious of that and some of the criticism that has been directed has been legitimate criticism. Most of it has been a misunderstanding of our intent, but we are trying to deal with that in a constructive way. We are making changes, and I suspect that, before long, the program will be modified along the lines that you are describing.

Mr. **Dymally**. Thank you very much, Mr. Chairman.

That's all.

Mr. **Hawkins**. Mr. Galloway, you referred several times to our efforts to get more Federal money into the program, but when we get back to Washington and we tell them that the county of Los Angeles is using Federal money in order to reduce its general relief rolls, you are either going to get less money or you're going to get a prohibition against that use.

Mr. GALLOWAY. Well, I think that would be very unfortunate, Congressman, if that happened, because I think that the fact is we are training people who are eligible for this program. The distinction that is made many times is that there is somehow better eligibility for a person who is receiving aid to families with dependent children than there is for a person who is receiving general relief. We tried not to make that distinction.

We have found that the general relief recipient is the most difficult person that will attempt to break the welfare cycle. If we can break the welfare cycle at that point, then we have no doubt that that is going to have a salutary effect on a lot of the welfare programs that are now operating.

Mr. HAWKINS. Well, we don't disagree with you. We would hope, however, that you would seek welfare reform and not seek to use a program which is not designed to aid the county in reducing its own responsibility toward the general relief client. You should do it directly and not use a program which is not designed to do that in order to accomplish an objective which we concede is a desirable one. But the Federal Government is not in the welfare business.

Mr. HUFFORD. I want to interrupt for just a moment. One of the interesting things that has happened is this program has surfaced the general relief problem which has been invisible in this community for a long time. There are some great advantages, from my viewpoint as the budget officer for the county and having to work with the issue of funding a program like this and the great demands that are placed on our local resources, which, as you know, are very much limited now. What is really happening is we're putting more money into this program, not less. We have not avoided costs. We've added to our costs by—probably through inadvertence, putting more investment into training general relief recipients with local dollars than we had heretofore. The consequence of the reaction is that we're beginning a hasty retreat. We are going back to what Mr. Galloway described. We're going to go back to general relief, tight eligibility in our public social services department, and nonreferral of general relief or limited referral to work training. I think it's too bad, quite frankly. I think it's the pragmatic thing that we're going to have to do because of the indications that you will have difficulty in Washington. This is seen as a use of Federal funds to avoid the county costs, and, in fact, it has resulted in—just that situation—I agree with Mr. Edelman. We are spending more money than we otherwise would have. Actually I would argue, though, that we are investing more money in people than we probably intended to do. That's not so bad, but I think what's happening as a result of all of this is we're going to quickly go back into our various positions and administer a separate general relief program and a separate work training program and not use a resource that could have been very helpful.

Mr. HAWKINS. Well, I'm afraid the type of training you're going to be able to give them out of the limited resources that you make available and the failure to provide supportive services and the other things that these individuals need—you're going to have individuals that are going to be reapplying for relief. I suspect again we're going to find, as we have in the past, that it is very difficult to get back on relief, so they're going to be harassed, they're going to be embarrassed, they're going to go through a lot of human suffering. Unfortunately, that is what I anticipate may happen. I hope I am wrong, but we certainly look with great concern on the way it's being handled. Isn't it unfortunate that other SDA's aren't doing what we are doing. Well, you want them to follow the same mistakes that you are making. I think it's to their credit that they are trying to follow the law and not trying to use it as a means of providing it to reduce the welfare, the general relief roll. That wasn't the intent. You're saying that, because they're not doing it, you must, in a sense, violate the requirement in the law and serve those individuals because the county is responsible for the general relief plan. Let's face it. That's what it is. It's juggling money in order to reduce the budget and try to balance it, which is required by law. That's what's happening in this county. It's just a juggling of funds. You're going to get into the same trouble that we are getting into nationally in which we are going to have a $300 billion deficit. That's the way it's going to end up even in this county. I just don't think you can juggle this money around and use it just simply to reduce the county responsibility for general relief client.

Mr. HUFFORD. I wanted to get this idea out—I certainly don't want to get into a debate with members of the committee. I think perhaps I ought to quit talking.

Mr. HAWKINS. We'll be back in a few months to see how well you're doing, I'll tell you that, because we're going to keep on top of this. We hope that you set a new pattern and that you set a wonderful example, but it just doesn't look like it's headed in that direction. Mr. Martinez.

Mr. MARTINEZ. I appreciate Mr. Hufford's remark. I was in the marines and we never did withdraw. We always made a strategical withdrawal.

Mr. HUFFORD. Yes, sir.

Mr. MARTINEZ. Michael O'Reilly, executive director of the State job training council, says that, of the agencies in the State, your agency in Los Angeles County is the only one which has organized JTPA in this fashion. Doesn't it stand to reason that everybody else understood the intent and carried it out differently than Los Angeles County.

Mr. GALLOWAY. I think that is a misunderstanding, though, because in any county in California, the general relief population exists. I know for a fact that there are general relief recipients being trained under the JTPA program in other counties. What we have done here is to highlight a program by having a much larger component than anyone else. But, to say that general relief recipients are being excluded isn't quite correct.

Mr. MARTINEZ. No; I didn't say they're being excluded. What I'm saying is those people may be the same people, but they're coming to the program under a different——

Mr. GALLOWAY. They're coming voluntarily. They're being accepted into the program on a voluntary basis and we are requiring that, if they are assessed to be employable and have potential for skills training, they go into a training slot. That is a significant difference, yes.

Mr. MARTINEZ. That's what makes a distinction of you using that money for some——

Mr. **Galloway**. Yes, you're absolutely correct. There is an important distinction there.

Mr. **Hawkins**. Thank you very much, Mr. Hufford and Mr. Galloway, for your contribution this morning. Certainly we will continue to communicate with you and try to work out what we consider to be one of our greatest concerns.

Mr. **Hufford**. Thank you very much.

Mr. **Galloway**. Thank you.

Mr. **Hawkins**. Our next witness, Mr. Alexander Pope, the county assessor, has requested an opportunity to speak, and, at this moment, we would ask you, Mr. Pope, to kindly proceed as you desire.

STATEMENT OF ALEXANDER POPE, ASSESSOR, COUNTY OF LOS ANGELES

Mr. **Pope**. Thank you, Mr. Chairman. My name is Alexander Pope and I am the assessor for the county of Los Angeles.

At long last the controlling majority of the board of supervisors appears to be acknowledging the failure of their employment and training program. It's too bad that the majority members of the board are not here this morning to learn something directly about the problems with the program. Better late than never. Others have been critical of the board majority's approach from the beginning, as you've already heard from Supervisor Edelman. This was not some noble experiment for which the board majority deserves high marks for a good try, nor was it a well-intentioned effort to address our welfare problems in a business-like manner as they would have us believe. This brainchild of the doctrinaire board majority has squandered millions of dollars of county and Federal money. A business run the same way would be filing for bankruptcy.

We were promised that the county employment and training program would save $4 million. Instead it is now $6 million over budget and counting.

The program has failed because the board is led by those who have a simplistic view of the world that simply does not jive with reality. They wanted quick, easy solutions. They were not concerned with the human costs or the long-range impact. A poorly planned and ineptly administered program was the result.

First, there was the thought that Federal job training dollars could cover welfare expenses, thus saving money for the county, but Federal law prohibits such substitutions, as Congressman Hawkins has pointed out.

Then it came out that the real savings would come from welfare participants dropping out of the training program and not being able to go back on welfare. It was anticipated that people would give up rather than suffer through the frustrations and inequities of a program not really designed for them.

The county never realistically expected that people would be trained and get jobs. By its own admission, only one in five persons were expected to complete training and secure a job.

And, in all the haste, adequate termination and appeals procedures were not provided for. This was a fatal mistake. Without such procedures, participants could not be terminated and the savings from reduced welfare rolls never materialized.

Given those mistakes, is it any wonder that there have been overruns, not savings?

But there is another and more basic issue. I am speaking of human costs. There are thousands of unemployed individuals, young people, women, handicapped, blacks, Hispanics, other minorities, who are supposed to benefit from the millions in Federal funds that were diverted to this sadly bungled program. These moneys can never be recovered. The persons Congress intended to help get jobs, those who could make good use of needed employment training to escape the vicious welfare cycle—these people have suffered a far greater loss. They have been denied training and jobs and the dignity that working and providing for one's family bestows. They have been denied a chance at a better future. They are the ones, along with the taxpayers, to whom the board majority must answer for their doctrinaire ineptness.

Thank you, Mr. Martinez, Mr. Dymally, for your interest and concern and your long record of concern and interest in this very difficult area.

Mr. **Dymally**. First, Mr. Assessor, I want to commend you for a very succinct and a very much to the point statement.

It is obvious to me that the President's style has had some effect on the CAO because, whenever the President suffers a defeat, he claims victory. I thought it was rather interesting that a program which has been a total disaster has just been hailed as a success here. That to me is a very unique way of solving the city's problems. It reminds me of the time when we were in Vietnam. Senator Vandenburg of Michigan said, "Look, the best thing for us to do is to bring the boys back home and claim victory." So, in the face of a disastrous program, the CAO has said, "We have put more money into the program" suggesting a concern for people without admitting that he has had to put more money in because of the failure of the program. He promised $4 million in savings and he has put in another 12.

Mr. **Pope**. Maybe he was taking his queue from recent events in Lebanon.

Mr. **Dymally**. Thank you very much.

Mr. **Martinez**. I understand your concern because I share it in a way, especially for my district. I have two industries that went bankrupt, closed up, the Bethlehem Steel and Huffy Bike, large companies that employed a lot of people. A lot of the people involved were my constituents. I have met with them repeatedly. There has been a constant concern for job training. A good portion of them were that kind of a person that found himself, after working for many years at one place, trained in only one skill. These people don't want to go on welfare.

Mr. **Pope**. Right.

Mr. **Martinez**. They want to get back to work and as soon as they can.

Mr. **Pope**. One of the points is that, if we are going to use the very limited dollars which this administration sees fit to make available for these kinds of programs, it has to be used effectively. The kind of people that you're talking about, Congressman, are the people who can benefit from a program of this magnitude and this duration. The general welfare people who have been put into these slots, many of them have much more difficult and serious problems, as Mr. Galloway indicated, illiteracy problem and related language problems, perhaps a second language problem, and that kind of thing which cannot be dealt with in an 8- to 10-week period. They simply aren't the people for which this program was designated to target.

Mr. **MARTINEZ**. Well you have a good grasp of the intention of the bill because that's exactly it in a nutshell. The other people we know need help and there are other programs—there was a county program and evidently they've chosen to do away with it because they saw this dollar available to them.

Mr. **POPE**. I'm sorry you're making that statement to me rather than to Mr. Antonovich, Mr. Schabarum, or Mr. Dana, but hopefully they will get the message.

Thank you very much.

Mr. **HAWKINS**. Thank you very much.

Mr. **DYMALLY**. Thank you.

[Prepared statement of Alexander Pope follows:]

PREPARED STATEMENT OF ALEXANDER POPE, ASSESSOR, LOS ANGELES COUNTY

My name is Alexander Pope, and I am the assessor for the county of Los Angeles.

At long last the controlling majority of the Board of Supervisors appears to be acknowledging the failure of their employment and training program. Better late than never. Others have been critical of their approach all along.

But this was not some noble experiment for which they deserve high marks for a good try. Nor was it a well intentioned effort to address our welfare problems in a business-like manner as they would have us believe.

This brainchild of the doctrinaire board majority has squandered millions of county and Federal dollars. A business run the same way would be filing for bankruptcy.

We were promised that the County Employment and Training program would save $4 million. Instead it is now $6 million over budget and counting.

The program has failed because the board is led by those who have a simplistic view of the world that just does not jibe with reality. They wanted quick easy solutions. They were not concerned with the human costs nor the long range impacts.

A poorly planned and ineptly administered program was the result.

First there was the thought that Federal job training dollars could cover welfare expenses, thus saving dollars for the county. But Federal regulations largely prohibit such substitutions.

Then it came out that the real savings would come from welfare participants dropping out of the training program and not being able to go back on welfare. It was anticipated that people would give up rather than suffer through the frustrations and inequities that characterized the program.

The county never realistically expected that people would be trained and get jobs. By its own admission, not more than one in five persons were expected to complete training and secure a job.

And in all the haste, adequate termination and appeals procedures were not provided for. This was a big mistake. Without such procedures participants couldn't be terminated, and the savings from reduced welfare rolls never materialized.

Given these mistakes is it any wonder that there have been overruns, not savings?

But there is another and more basic issue. I am speaking of the human costs.

There are thousands of unemployed individuals: youth, women, handicapped, and minorities who were supposed to benefit from the millions in Federal funds that were diverted to this sadly bungled program

These monies can never be recovered.

Those persons Congress intended to help get jobs; those who could have made good use of employment training skills to escape the vicious welfare cycle; these people have suffered a far greater loss.

They have been denied training, and jobs, and the dignity that working and providing for one's family bestows. They have been denied a chance at a better future. Thank you.

Mr. MARTINEZ. Senator Bill Greene.

STATEMENT OF BILL GREENE, CALIFORNIA STATE SENATOR

Mr. GREENE. Mr. Chairman and members, you have copies of my testimony.

Mr. DYMALLY. Before you start, Bill, I just want to thank you. I called you once before to say thank you about getting my bill out.

Mr. GREENE. I told people that you were the only Member of Congress that I could find in the history of the State of California which had a measure by the Senate and signed into law while you were a Member of Congress. So you could use that in your campaign brag sheet that you set a record there.

Mr. DYMALLY. Very good. Thank you.

Mr. GREENE. It's a good bill on job training too, Congressman Dymally.

Mr. Chairman and members, let me say that it is my privilege to be here to appear before you this morning.

Joining me is Alan Davenport who joined my staff this year. I managed to sneak him away from EDD. He is one of the bright, experienced, and capable people with EDD also represented them before the legislature. I was impressed with his talents and ability.

Also joining me is Mr. Gregory Schmidt who is chief consultant to Senator Bill Lockyer. He is here because we're going to make reference to the Family Economic Security Act, which we developed here in California. You will see its relationship in my testimony. Gregory was the chief staff architect of that with Senator Lockyer and that was just before the Senator came to the assembly when he chaired my counterpart committee on the assembly side. He and I, I might say, have, for several years, put our heads together to see how we could begin to make some sense out of what we have and what was coming down the pipe rather than the confusion that we have now. Of course, the situation that we're in now we certainly did not anticipate. So, Mr. Schmidt is here to comment and testify on behalf of Senator Lockyer in that regard. I would appreciate it if you would give him an opportunity to make his remarks after I finish my testimony. Mr. Davenport is here to respond to your questions.

Let me say also, Mr. Chairman and members, that ever since I have chaired the industrial relations committee, which goes back to 1976, and then subsequently in 1977 when I became the chairman of the subcommittee of senate finance, which handles the budget for this entire area as well as all of health, medical, Medi-Cal, employment, rehabilitation and what have you, some one-third of the State's budget—this year the portion of the budget that we handled was $7.1 billion, which means that we frankly sit at the juncture both on the policy side and on the appropriation side of everything that the legislature does in this regard. It's finally worked out by conferees on the budget.

My two Congressmen represent my position very clearly and very stalwartly in that regard, so my comments here this morning are really made as the chairman of the senate industrial relations committee of the Senate of California, and as the chairman of the budget appropriations committee.

I might state that the comments that I will make here this morning are those that I have been making in the city and the State where we are faced with the same kind of situation.

We have carefully reviewed the Los Angeles County job training plan and would like to focus our attention on certain aspects of this plan that clearly stray from the course envisioned by the Family Economic Security Act and, unfortunately, confirms our worse fears of what could possibly happen with the Job Training and Partnership Act.

Let me say that the Family Economic Security Act [FESA], was an act that we purposely developed and purposely fine tuned so as to conform with the Reconciliation Act and then subsequently did the same thing with the Job Training Partnership Act. We amended certain aspects of the former CETA program, but it was purposely formed and structured to provide training and to provide all of the backup services for people on welfare. It was our thinking that we needed a tight system, but part of what we found has been a problem here in the State of California is that people far too long have intermingled these categories. So we developed this legislation, under Senator Lockyer's guidance and leadership, to take care of categories such as this.

Now it is our opinion that the Los Angeles County job training plan does two jobs very badly. It does not train people for jobs and it does not get them off welfare.

I believe that, under a properly administered Family Economic Security Act, excesses of the Los Angeles County plan would have been curbed; however, these excesses apparently cannot be controlled under the Job Training Partnership Act.

Los Angeles County intends to refer over 10,500 county welfare recipients to 10,000 adult training slots. However, only 3 percent of the adults served will be recipients of aid to families with dependent children, which, of course, is the Federal-State welfare program. Instead, up to 97 percent will be and are recipients of general relief, as has been pointed out here and, as you have spotted so accurately, is entirely county costs. Now this means that, in our service delivery area where we have over 282,000 economically disadvantaged adults, and over 100,000 of them unemployed, the JTPA funds will almost entirely be reserved for about 9,000 recipients of general relief, nearly one-sixth of whom have not worked in the last 5 years.

The job training plan affects people who, of course, live in our district as well as elsewhere. We, of course, are well aware of Los Angeles County's concern for its general relief costs and the direction of their plans to curb that cost, but we certainly cannot embrace what they have done in this instance.

Now, members of this committee and, of course, members of the board of supervisors, and all of us can and will agree on what is effective job training and the importance of keeping people off welfare.

However, I have grave concerns about this particularly misguided attempt of using job training funds to reduce county welfare costs. By its own description, and let me cite that all of the figures that I used are the figures that we have taken from the plan itself, this plan is doomed to failure. Only 22.4 percent of the welfare clients served will obtain unsubsidized employment. This very low job placement rate, something I am sure that this committee and certainly we have never envisioned, is apparently permitted under the act.

One recommendation that I wish to put into the record is that the testimony of this subcommittee hearing in this city may be used as a basis to cover up some of these holes in the national plan.

Los Angeles County actually plans to fail 78 percent of the welfare recipients to whom it provides job training services.

While this plan may be within the legal parameters of JTPA, it is clearly bankrupt. It is an obviously inefficient use of scarce job training resources. The Los Angeles County plan forecasts the waste of nearly $5.5 million, more than three-quarters of the money available for training adults in the Los Angeles County service delivery area. These dollars could be used and directed to more productive job training, either by targeting funds to necessary services that will give people the tools they need to succeed in the world of work, or by selecting from a larger portion of the economically disadvantaged community those most likely to succeed in terms of their need and be job-ready within the service areas.

This waste is not only a disservice to the individuals themselves, it's a disservice to the system; it's a disservice to the law and certainly it's a disservice to taxpayers.

Seventy-eight percent of the welfare participants will receive nothing from this plan but a false promise of economic opportunity. At best, these people will wind up back on welfare; at worst, they will be driven back into the streets. This plan does not train people for jobs and it does not get them off welfare.

How did this happen? JTPA gave the Federal job training money to the Governor and the State job training coordinating council to parcel out among the services delivery areas, but it gave the State administration very little quality control over job training plans. Now, I am certain that the members of this committee will look to all of those of us at the State level to effectively administer these Federal funds. But we do not have the tools that we need, gentlemen, and I think that what we are digging into here this morning is an example that you should take its being a bit more pervasive than it might appear at the moment because our digging around in our information tells us that there are county welfare directors in other areas of this State who are watching very closely what happens as a result of Los Angeles County's action. We know of six counties that, if there is the slightest hint that this at least will not be denounced by Congress or a congressional committee, or if there isn't some attempt made to change it or to alter it, we have very valuable information that we have confidence in that there are six counties that are going to duplicate what Los Angeles County has done.

So what we are seeing is just the beginning, not an isolated incidence now, but not to remain that way unless you and we and other persons who are concerned with this say, "This is not what was intended and this is not what we'll be delivering."

Basically, as long as Los Angeles County shows that it can adequately administer the funds and plans to serve a few specified portions of the unemployed and economically disadvantaged population, the State must give them the JTPA money. Because of the free startup year and the 2-year planning process, we predict that it will be at least 2 and perhaps 3 years before the State job training coordinating council is in a position to say, "No, this plan is unacceptable because it does not put people to work on jobs in the private sector."

At the State level, in the Family Economic Security Act, we tried to create a strong and truly coordinated State training council. While we provided for flexibility in planning job training, we established the direction and priorities by statute. FESA, by contrast with the Los Angeles County plan, gives first priority in job training to unemployed parents and other recipients of aid to families with dependent children. Focusing job training in this way has the added advantage of removing a whole family from welfare and not just a typical single male on general relief.

Now under FESA, as it was conceived, and under the right administration, the critical flaws apparent in the plan need not have been endorsed. The State council could have set strict qualitative standards for plans and rejected those plans that did not meet those standards. Present JTPA standards in California are largely procedural in nature. If the plan is touched by the designated hands, it is approved and funded. Under FESA, a county that did not adhere to its plan could lose its funding. This was to encourage both thoughtful planning and careful implementation, neither of which is apparent in the Los Angeles County example.

In implementing JTPA, the Family Economic Security Act would have required critical review of the plans by the council and effective monitoring by the State administration. FESA even today allows the State administrator to bring noncomplying counties to a hearing before the State job training council, which may withhold funds in order to achieve compliance.

Now FESA, in a sense, has been subsumed by the Job Training Partnership Act to the extent never contemplated by members of this committee and certainly not by our general membership in the California Legislature.

Some of the compliance methods that I mentioned are available to the Governor should he choose to use them. Apparently Governor Deukmejian has chosen to relinquish his responsibilities and allow local government free rein under JTPA. He and his council are ignoring the direction of the State legislature for coordination and efficient use of job training funds.

I see the Los Angeles County plan as the distorted reflection of the job training coordination envisioned by myself, by all the members of this committee, and certainly by the bipartisan majority vote of the members of the California Legislature.

But I have one other serious concern about the Los Angeles County plan that I have not heard anyone discuss this morning and I would like to bring it to your attention.

I wonder how the Private Industry Council could have approved this plan. I wonder how much private sector thought went into a plan so poorly drafted that it specifies 31 skilled or semiskilled occupations that industry needs, and for which people could be trained under the Job Training Partnership Act, but provides training for only 11 of these occupations.

Now I realize that the Los Angeles Private Industry Council has barely been formed—or it had barely been formed when this plan was developed. I would urge that the council in the future do all it can to help the county develop a plan that trains workers whom business will hire.

I would also note that, under CESA, those groups most likely to benefit from successful job training had mandated representation on the Private Industry Council. JTPA's less clear direction has allowed PIC's to ignore participant input. An increased willingness by a business to listen to participant concerns and an increased willingness by the county to listen to businesses' concerns I'm sure would have resulted in a better job training partnership and a better Los Angeles County plan.

Let me say that there are several fallacies—and I'm certain that you've caught them, but I would like for them to be in my testimony. In speaking of the county's input of dollars into training and general relief, members of the committee, there has been no training program in general relief. This is the first time. So that statement is—they started from zero and they put $1 in. They were putting in more than they had ever put into training in general relief in the history of the State of California. We've researched it. General relief is basically no different from what it was when it was first established on the books here in the State of California in terms of what it provides. General relief for many, many years was a very temporary situation. For example, many of our refugees that came over before the refugee laws were really in operation, qualified under general relief. That was to tide them over, to get them started.

So we have to be careful. I cannot, just in good conscience, permit those figures to be used without pointing out the fallacies in them.

Now they speak of meeting the Los Angeles County's goal, that they will have met that goal by the end of the year. Well, when we look at the Los Angeles County's plan, their goal is only 35 percent, so they mean that they will have accomplished 35 percent in training, not a mark that I'm sure was envisioned by yourself, Congressman Hawkins, by other Members of the House, in developing the JTPA.

Also, in their figures where they stipulate that the general relief portion of the JTPA funds does not use up the percentage that is generally believed, the manner in which they are able to make it appear that way is that, in the figures showing the total population of need—the total population for which the JTPA funds appropriately could and should be used—they include youth. There are no youth on general relief.

So there are many fallacies in the testimony that has been given here. I'm certain that the members of this committee spotted it, but I wanted it to be a part of my testimony.

Let me close my remarks by noting that the two main improvements on CETA that have been created in the Job Training Partnership Act are the direction, in our opinion, and certainly for those of us here in California who are intimately involved with this, except for the Los Angeles situation—this involvement of private industry and the administration by the Governors of the States are, as we see from the example here in Los Angeles, direction from private industry has yet to mature and State administration is, in both design and performance, weaker than it ever should be.

In our role in the State legislature, we will continue to be vigilant in this regard and to supply you with any and all of the information that you would need and want.

With that, I ask that Mr. Schmidt be given an opportunity to make a few remarks on behalf of Senator Lockyer, and then we'll entertain any questions that you might have.

[Prepared statement of Senator Bill Greene follows:]

PREPARED STATEMENT OF BILL GREENE, CALIFORNIA STATE SENATOR

Mr. Chairman and members of the committee: I am Bill Greene, chairman of the Industrial Relations Committee of the California State Senate. I want to express my gratitude to Congressman Hawkins and Congressman Dymally for holding this hearing to review the Los Angeles County Job Training Plan. It is important that those of us who are committed to the private-public job training partnership maintain vigilance over the program that we as legislators worked so hard to create. Having consulted with Congressman Hawkins on numerous occasions while he was creating the improvement in CETA that became the Job Training Partnership Act [JTPA], and as one who worked closely with State Senator Bill Lockyer to put together California's parallel legislation, the Family Economic Security Act, I am pleased to assist the committee in its fact-finding mission.

As Mr. Hawkins and Mr. Dymally are aware, I am chairman of the State Senate Policy Committee that approves all job training legislation created in California and I am chairman of the Finance Subcommittee that reviews California's disbursement of Job Training Partnership Act funds. I have carefully reviewed the Los Angeles County job training plan and would like to focus the committee's attention on certain aspects of this plan that clearly stray from the course envisioned by the State Family Economic Security Act, and unfortunately confirm my worst fears of what JTPA could become.

It is my considered opinion that the Los Angeles County plan does two jobs badly. It does not train people for jobs and it does not get them off welfare. I believe that under a properly administered Family Economic Security Act the excesses of the Los Angeles County plan could be curbed; however, these excesses apparently cannot be controlled under JTPA.

Mr. Hawkins, Mr. Dymally, the Los Angeles County Supervisors, and myself can all agree on one of the goals of both the Family Economic Security Act and JTPA: targeting job training funds to recipients of public assistance. Los Angeles County intends to refer over 10,500 county welfare recipients to its 10,000 adult training slots. However, only 3 percent of the adults served will be recipients of Aid to Families with Dependent Children [AFDC], the federal-state family welfare program. Instead, up to 97 percent could be recipients of General Relief, a program funded entirely by the county. This means that in a service delivery area with over 282,000 economically disadvantaged adults, and over 100,000 unemployed, JTPA funds will be almost entirely reserved for about 9,000 recipients of General Relief, nearly one-sixth of whom have not worked in the last 5 years.

This job training plan affects people who live in the 29th State Senate District I represent, and in Congressmen Hawkins', and Dymally's districts too. We are well aware of Los Angeles County's concern with General Relief costs and the direction of this plan to cure that problem. Members of this committee and the Los Angeles County Board of Supervisors may count me among those who believe that welfare should be a temporary program for people in need and that effective job training is an important component of keeping welfare temporary.

However, I have grave concerns about this particularly misguided attempt at using job training funds to reduce welfare costs. By its own description (and all of the figures I use are from the plan itself), this plan is doomed to failure: only 22.4 percent of the welfare clients served will obtain unsubsidized employment. This very low job placement rate—something I am sure this committee never envisioned—is apparently permitted under U.S. Department of Labor regulations implementing JTPA. Los Angeles County actually plans to "fail" 78 percent of the welfare recipients to whom it provides job training services.

While this plan may be within all the legal parameters of JTPA, it is clearly bankrupt. It is an obviously inefficient use of scarce job training resources. The Los Angeles County plan forecasts the waste of nearly $5½ million—more than three quarters of the money available for training adults in the Los Angeles County Service Delivery Area. These dollar could have been directed to more productive job training: either by targeting funds to necessary services that would give people the tools they need to succeed in the world of work, or by selecting from a larger portion of the economically disadvantaged community those more likely to succeed with the services available.

This waste is not only a disservice to the taxpayers, but to the poor as well. Seventy-eight percent of the welfare participants will receive nothing from this plan but a false promise of economic opportunity. At best these people will wind up back on welfare, at worst they will be driven into the street. This plan does not train people for jobs and does not get them off welfare.

How did this happen? JTPA gave the Federal job training money to the Governor and his Job Training Council to parcel out among the service delivery areas, but gave the state administration very little quality control over job training plans. You, Mr. Hawkins, look to us at the state level to effectively administer these funds. But we do not have all the tools we need. Basically, as long as Los Angeles County shows that it can adequately administer the funds and plans to serve a few specified proportions of the unemployed disadvantaged population, the state must give it the JTPA money. Because of the "free" start-up year, and the 2-year planning process, it will be at least 2 and perhaps 3 years before the State Job Training Coordinating Council is in a position to say "No, this plan is unacceptable because it does not put people to work on jobs in the private sector."

At the State level, in the Family Economic Safety Act [FESA], we tried to create a strong and truly coordinating State Job Training Council. While we provided for some local flexibility in planning job training, we established direction and priorities by statute. FESA, to contrast with the Los Angeles County plan, gives first priority in job training to unemployed parents and other recipients of Aid to Families with Dependent Children [AFDC]. Focusing job training in this way has the added advantage of removing whole families from welfare, not just the typical single male on General Relief.

Under FESA as it was conceived, and under the right administration, the critical flaws apparent in the plan need not have been endorsed. The State Council could have set strict qualitative standards for plans and rejected those plans that did not meet those standards. Present JTPA standards in California are largely procedural in nature: if the plan is touched by the designated hands, it is approved and funded. Under FESA a county that did not adhere to its plan could lose its funding: this was to encourage both thoughtful planning and careful implementation, neither of which is apparent in the Los Angeles County example. In implementating JTPA, FESA would have required critical review of plans by the Council and effective monitoring by the State administration. FESA even today allows the State administrator to bring noncomplying counties to a hearing before the State Job Training Council, which may withhold funds in order to achieve compliance.

FESA is not dead, but it has been subsumed by JTPA to an extent never contemplated by members of this committee or by the California Legislature. Some of the compliance methods I mentioned are available to the Governor should he choose to use them. Apparently Governor Deukmejian has chosen to relinquish his responsibilities and allow local government free rein under JTPA; he and his council are ignoring the direction of the State Legislature for coordination and efficient use of job training funds.

I see the Los Angeles County plan as a distorted reflection of the job training coordination envisioned by myself and Congressman Hawkins in JTPA.

I have one other serious concern about the Los Angeles County plan that I would like to bring to the committee's attention. I wonder how the Private Industry Council could have approved this plan. I wonder how much private sector thought went into a plan so poorly drafted that it specifies 31 skilled or semi-skilled occupations that industry needs—and for which people could be trained under JTPA—but provides training in only eleven of these occupations. While I realize the Los Angeles Private Industry Council had barely been formed when this plan was developed, I would urge this council in the future to do all it can to help the country develop a plan that trains workers who business will hire.

I would also note that under FESA those groups most likely to benefit from successful job training had mandated representation on the Private Industry Council. JTPA's less clear direction has allowed PICs to ignore participant input. An increased willingness by a business to listen to participant concerns and an increased willingness by the county to listen to business concerns would have resulted in a better job training partnership and a better Los Angeles County plan.

I would like to close my remarks by noting that the two main improvements on CETA you have created in the Job Training Partnership Act are the direction by private industry and the administration by the Governors of the States. However, as we see from the example of Los Angeles County before us, direction from private industry has yet to mature and State administration, in both design and performance, is weaker than it should be. In my role as the State Senator responsible for reviewing all job training policy and funding in California, I pledge my full support to your efforts to develop job training that puts people to work in jobs that help the economy grow. Thank you again for this opportunity.

CALIFORNIA LEGISLATURE,
SENATE COMMITTEE ON HEALTH AND WELFARE,
February 14, 1984.

Hon. AUGUSTUS HAWKINS,
Chairman, House Subcommittee on Employment Opportunities, House Office Building, Washington, D.C.

DEAR REPRESENTATIVE HAWKINS: As chairperson of the Health and Welfare Committee of the California Senate and as a senator from the Los Angeles area, I am submitting the attached comments on the Los Angeles County job training plan. I respectfully request that my comments be made part of the record for the hearing held by the House Subcommittee on Employment Opportunities on February 14 1984, in Los Angeles, California.

In general, I would like to register my opposition to the manner in which federal job training funds are being used primarily for the county's General Relief recipients, to the possible exclusion of AFDC and other needy persons residing in the service delivery area. I believe the limited training resources should be concentrated on other segments of the low-income population who would benefit more from the training and hence provide a higher return on the county's investment than has been seen in the General Relief population. The guidelines embodied in Senator Lockyer's Family Economic Security Act establish, I believe, a better system of priorities for use of job training funds than the Los Angeles County plan.

Sincerely,

DIANE E. WATSON, *Chairperson.*

Attachment.

COMMENTS OF SENATOR DIANE E. WATSON, SUBMITTED TO THE HOUSE SUBCOMMITTEE ON EMPLOYMENT OPPORTUNITIES, FEBRUARY 14, 1984

Representative Hawkins and members: I appreciate the opportunity to present my comments for the record. You are to be commended, first, for your principal role in the enactment of the Job Training Partnership Act [JTPA] and second, for holding this hearing today. A program of employment training, developed in partnership with private industry, and focused on the economically disadvantaged, is of primary value and importance to California.

However, as you know from your experience in Congress, enactment of a law and implementation of it may be two very different matters. It appears that the job training plan under which the Los Angeles County Private Industry Council is operating does not meet the intent of JTPA. Los Angeles County apparently has abrogated its responsibilities of caring for indigents by using the job training program to avoid providing for the legitimate subsistence needs of its General Relief population. As reported in several articles in the local newspapers, the county expected to save $4 million, not because recipients trained under the program would move off the assistance rolls, but because they would drop off aid rather than undergo training. This expected result, of course, has not materialized.

Concentrating these limited Federal training dollars on the General Relief population in the county means that other equally needy groups—notably young AFDC mothers and black and Hispanic unemployed youth—will not have as much access to job training programs as they will have otherwise. I feel that Congress and the taxpayer will realize a better return on the job training dollar if these other groups are served in larger numbers. For the most part, these other groups are more employable and job-ready than many of the General Relief recipients. The likelihood, therefore, that a job training program will enable them to eventually move into self-sufficiency is greater.

Along these lines, I believe a better integration of employment and training programs and programs serving AFDC and other low-income persons is called for. California has already established a mechanism for doing this in Senator Lockyer's Family Economic Security Act, which will be described in other testimony today. In that piece of legislation, certain groups are targeted for receipt of services in order of their likelihood of success, with AFDC, not General Relief, recipients first. Although FESA was not funded in state budget, the approach in that law is preferable to the Los Angeles County approach.

In conclusion, I encourage the members of this subcommittee to examine very closely the priority for service established in the Los Angeles plan, and to question whether even more scarce job training funds should be diverted into a program that not only has not accomplished its objectives thus far, but which also is questionable in terms of meeting the intent of JTPA.

Mr. **Martinez**. All right. We'll hear from Gregory Schmidt. Nice to see you again, too.

STATEMENT OF GREGORY SCHMIDT, SENIOR CONSULTANT TO THE SENATE ELECTIONS AND REAPPORTIONMENT COMMITTEE

Mr. **Schmidt**. Mr. Chairman, I have submitted a written statement for the record.

I would just like to state a couple of things we suggested might be changed in Federal law to assist the State.

No. 1, the role of the legislature in the process should be expanded to act as a counterforce to the institutional inertia of the bureaucracy and the unilateral actions of the Governor that have occurred in California. This is particularly essential here where legislative sentiment is probably closer to congressional intent regarding JTPA than is the attitude of the State administration. I would suggest mandatory review of programs and confirmation procedures for all State council members.

States should be provided greater leeway in customizing the program to reflect State goals and regional economic needs. The Federal law diluted our targeting toward AFDC, which Senator Greene referred to, at a time when we had constructed a system that might have effectively served that population and all other target groups. The Federal law prohibited representation on decisionmaking bodies that we felt essential, for no good reason. It mandated a service delivery structure that makes difficult our experiment integrating welfare and employment services. I hesitate to mention it, but we'd certainly appreciate a bit more of a commitment to federalism in this regard at a time when we are trying to do something positive.

Finally I would urge you to join us in an effort we've undertaken on the State level to organize our job preparation resources and seek some order out of the chaos of programs we now fund. We have JTPA, we have WIN, we have adult vocational eduation, regular vocational education on the community college and high school levels. We in California have the conservation corps, youth employment programs, regional occupational centers, and on and on. This is not only confusing to the public, it results in a diffusion of energy and resources and makes coordinated planning nearly impossible. We can foresee an integrated system of employment preparation, readying people for the labor market of the 20th century. This system will require a different emphasis than our previous preoccupation with 4-year colleges and our noncoordinated establishment of various programs for various groups.

We believe that the input of the business community is essential in this process and consider JTPA, at least on paper, as a start. Perhaps the JTPA structure is the one under which we should subsume all these other programs if we can work out the problems that have been mentioned. But we should be considering the next step now in this integration process, not when we have to react to some crisis with JTPA.

Thank you very much for the opportunity to make a few points.

Mr. **Greene**. Mr. Chairman and members, let me indicate, before we depart, that we are temporarily in somewhat of a unique positon here in the legislature. We can get more bipartisan support for some of the kinds of things that we have developed than is normally the case. I know there's a difference of opinion between our Republican and Democratic members, but I still feel confident that the carefully crafted, well-drawn proposal still gets bipartisan support in the California Legislature.

Mr. **Hawkins**. Thank you. I'm confident of that, Senator Greene. As you well know, we have discussed this matter very extensively over a long period of time.

May I take the opportunity to congratulate you on what you have done in this field? We have tried to coordinate activities so that Federal law and State law would conform to many of the suggestions that you have indicated today.

Personally, I believe that it was unfortunate that there was an attempt to badmouth the CETA program. We have seen the individuals today who admitted that the CETA program works. Wonderful programs have been operating in the country for more than a year under CETA, and now we're beginning to see some evidence that some of the newer programs are not doing nearly as well. CETA, which had a very high placement rate, was suppressed. Now what we have done is we have simply destroyed a program that could have operated well. The private sector involvement was mandated under title VII of CETA. We could have done everything under that title that we are now proposing to do under JTPA. Let's hope that it will be accomplished, but I think it goes back to the fact that individuals who want to do a good job can do it. I don't think CETA was necessarily bad, even though they fixed the record in order to destroy it. I quite agree with the point that's been made throughout the act. It speaks of the State. What it should have done is it should have substituted the word "governor" for the "State" because the sole representative, really, for the State is the Governor. I was surprised, quite frankly, when I didn't hear from you and some of the other State legislators. When you were not being included in the act. So it's one of the few instances where I didn't hear from you.

But I do want to say that this committee, for several years and many times in your presence, did travel to California to look at the CWETA program, for example. This was a wonderful program. It succeeded. And perhaps it succeeded so well that they wanted to eliminate it.

Mr. **Greene**. Well they did.

Mr. Hawkins. And they eliminated that program. I would hope that a year from now, the JTPA program will not be discarded because it can't work. The same people who criticized CETA are now constructing something which they would be ashamed of even admitting a year from now. Then we'll get into another program. This will be the seventh time that I have participated in drafting a major jobs legislation since I have been in Congress, and possibly this year will see some developments elsewhere.

So I do want to congratulate the witnesses.

Mr. Greene. Let me give you a figure. It's startling. The CETA/CWETA combination produced 30 percent of the training in the aerospace industry in the Silicon Valley. The actual figure is 32 percent, so that's what it can produce.

Mr. Dymally. Mr. Chairman, Senator Greene now represents Compton for the first time, and I can't let this opportunity go by without mentioning the fact that, beginning last year, under CETA and CWETA, we organized a job training program in Compton. As a result of JTPA, we no longer have CETA or CWETA. Last month was the last of the program. So a very promising program in Compton which is not being served by JTPA now is lost.

Mr. Greene. Thank you.

Mr. Hawkins. I again thank the witnesses.

Thank you, Senator.

The next panel is the Los Angeles County Private Industry Council. Mr. Carl Herman is the vice chair, and he's accompanied by Mr. Doug Shaw, a member and chairman of the opportunities oversight committee; Mr. Paul Bluto, a member and chairman of the planning committee; and Mr. Rod Hanks, the business representative.

Gentlemen, we welcome you and look forward to your testimony.

I regret that we delayed you so long, but I understand that you do have other commitments, for which we apologize for having delayed you, but we look forward to your testimony.

[Prepared statement of Gregory Schmidt follows:]

Prepared Statement of Gregory Schmidt, Senior Consultant, Senate Elections and Reapportionment Committee

Mr. Chairman and members, my name is Gregory Schmidt. I am the Senior Consultant to the Senate Elections and Reapportionment Committee and am here today representing Senator Bill Lockyer, Chairman of that Committee. The Senator sends his best wishes. He has been detained in Sacramento because of a meeting on reapportionment, an issue that seems to have as much staying power as full employment and welfare reform.

Senator Locker, previously an Assemblyman and Chairman of the Assembly Human Resources Committee, was the author of AB 3424, the Family Economic Security Act, which is the California counterpart to the Job Training Partnership Act. I was the Principal Consultant to that Committee during the 1980–82 session and worked closely with him in drafting the measure. I also sit, as his representative, on the State Job Training Coordinating Council. So what I say today is essentially a statement of legislative intent, an explanation of what we believed we were doing, how we perceive the inter-relationship between state and federal law, and what we suggest should be done to improve the overall program for the benefit of California's economically disadvantaged.

The Family Economic Security Act was actually born in Washington, in the summer of 1981. A number of us had gone back to monitor developments arising from the Omnibus Budget Reconciliation Act, and had gathered one night to bemoan the fact that, for over a decade, the President and his advisors had forced us into a defensive position on welfare and social services. We were continually fighting a rearguard action, defending programs which we all realized were less than successful in breaking the cycle of poverty. We determined to do something about that. What we felt was necessary was a fundamental transformation of the welfare system—from a program of income maintenance to one of employment preparation and training. Such a change, we felt, would reflect a change that has occurred in our society since the '30's. Where AFDC was established to permit women to stay home and raise their children, as the public then felt apppropriate, now it would provide a mechanism whereby they might enter the labor market and provide for their own economic security. This was thought to be consistent with changing roles of women in the society.

As we went to work on that program in Sacramento, it became clear that major changes were afoot in Congress, that CETA would soon be replaced by a new program that, in its first drafts, showed remarkable similarity to what we were proposing in California. We worked hard to ensure that the measures were consistent, at least in terms of structure, and in that we were remarkably successful. But there remain marked differences between TJPA and FESA, regardless of the fact that FESA is considered state-enabling legislation and regardless of surface similarities.

FESA was meant to be a major change in AFDC. We proposed to integrate the welfare system with the job training programs overseen by our Employment Development Department, and to earmark the great majority of federal job training dollars for AFDC recipients. Displaced workers were to be served by a state-only program of training administered by an Employment Training Panel. Participation in job training was to be a criterion, when appropriate, for welfare eligibility.

We perceived a county-based system of service-delivery areas, in order to facilitate integration of job programs and the county-based welfare system.

We proposed a private industry council, and a state council, with the significant participation of program recipients themselves, and child care providers, and other such individuals who might provide the business members with some insight into the actual effect of their decisions.

We'd hoped for a job preparation process, modified by the private industry councils in each service delivery area, to reflect labor market demand, to provide clients with genuinely useful counseling and training, to provide support services such child care that would truly create an opportunity for economic mainstreaming.

Little of this has happened, partially due to the confusion that arises with any new program, partially due to inconsistencies between state and federal program goals, but primarily due to the unwillingness of some of the program administrators and advisers to take these goals seriously.

While JTPA is admirably crafted to provide services to the economically disadvantaged, there is an understandable tendency on the part of private industry council members and state council members, as business people, to steer the program toward the most employable. That we can live with, and continue to push against it, because there is at least an economic justification to it. Less acceptable is the tendency in some service delivery areas, particularly Los Angeles, to subvert the program by using it as a means of reducing the county General Assistance caseload. It would be unfair not to mention that some progress is being made in expanding services to AFDC—our state target group. But JTPA as currently administered does not contain the focus on that group that we had intended in state legislation.

Regarding the county-based structure of the service delivery areas—we lost that fight in Congress and so are saddled with a mongrel system of city, county, and consortia that greatly complicates the integration of welfare with job training. We hope it can be worked out, and there are people on the local level who are working in good faith to see that services are coordinated, even if structure is not integrated. But we've received very little support from the state administration, which prefers to pursue workfare as an appropriate exercise for welfare recipients, rather than realistic preparation for the marketplace.

We have lost the battle in our effort to ensure the effective participation of clients and service providers in the decision-making process. Federal law has been interpreted to preclude the addition of mandated seats for child care or for recipients on the PIC's. Appointments to the state council, even under the provisions of the federal law, were somewhat perverted by the Governor in the choices he made. The Lieutenant Governor was designated to represent those eligible for the program. The appointee for community-based organizations, although a good man, had no experience with those groups or with service delivery.

Most aminous, however, are the trends we see toward the "bureaucratization" of the program. The business community's participation has been enthusiastic, but runs into a wall of paperwork generated by EDD, similar to that spewn forth by the Department of Labor under CETA. This makes if difficult for the private sector participants to even perceive their choices, much less make knowledgeable decisions. Unilateral budgetary decisions, such as the recent decision to deny EDD services to PIC's except under contract—and then to make available personnel scarce—undermines the faith of the business community in the government's willingness to be a fair partner in the program. The lack of staff on the part of the state council hampers its ability to act independently of the bureaucracy and so subjects it to the possibility of manipulation. In fact, there seems to be no effective check on the ability of the state administration to manipulate the program to its own ends, regardless of the sentiment of both state and federal statute. Therefore, something remains to be done.

I realize it's highly unlikely that any significant changes will be made to JTPA during this election year or in the near future. But I would strongly suggest the following:

1. The role of the Legislature in the process should be expanded, to act as a counterforce to the institutional inertia of the bureaucracy and the unilateral actions of the Governor. This is particularly essential in California, where legislative sentiment is probably closer to congressional intent regarding JTPA than is the attitude of the state administration. I would suggest mandatory review of programs and confirmation procedures for all state council members.
2. States should be provided greater leeway in "customizing" the program to reflect state goals and regional economic needs. The federal law diluted our targeting toward AFDC, at a time when we had constructed a system that might have effectively served that population *and* other target groups. The federal law prohibited representation on decision-making bodies that we felt essential, for no good reason. It mandated a service delivery structure that make difficult our experiment integrating welfare and employment services. I hesitate to mention it, but we'd certainly appreciate a bit more of a commitment to "federalism" in this regard at a time when we are trying to do something positive.
3. Finally, I urge you to join us in an effort we've undertaken on the state level to organize our job preparation resources and seek some order out of the chaos of programs we both now fund. We have JTPA, we have WIN, we have adult vocational education, regular vocational education on the community college and high school levels. We in California have the Conservation Corps, youth employment, regional occupational centers—and on and on. This is not only confusing to the public, it results in a diffusion of energy and resources and makes coordinated planning near impossible. We can foresee an integrated system of employment preparation, readying people for the labor market of the 20th century. This system will require a different emphasis than our previous preoccupation with four-year colleges and our noncoordinated establishment of various programs for various groups. We believe that the input of the business community is essential in this process—and consider JTPA, at least on paper, as a start. Perhaps the JTPA's structure is the one under which we should subsume all these other programs . . . if we can work out the problems I've mentioned. But we should be considering the next step now—not when we have to react to some crisis with JTPA.

In closing, I think it's appropriate to point out that a great many well intentioned people are doing their best to make this new partnership work. I certainly can't fault the enthusiasm of most of the business people I know who are donating their time and energy to get JTPA off the ground. But I encourage you to consider the problems I've mentioned and to do what you can to make sure that the Act and its accompanying state programs do not bog down in bureaucratic mishmash or become subverted by individuals unenthusiastic about the principles you have enunciated in the act. To permit that would leave us at square one, at a time when vigorous efforts are needed more than ever to assist large segments of our population to enter the economic mainstream, and would render all our work so far a useless exercise.

STATEMENT OF CARL A. HERMAN, VICE CHAIR, LOS ANGELES COUNTY PRIVATE INDUSTRY COUNCIL

Mr. HERMAN. Mr. Chairman and members of the committee, I'd like to first express the fact that Mr. Fragner, our chairman, regrets not being here. He's on an extended business trip. Also, Rod Hanks could not make it, but Messrs. Bluto and Shaw are here representing the council.

Again, thank you for the opportunity to speak to you today on behalf of the Los Angeles Private Industry Council during your factfinding hearing on the Job Training Partnership Act program.

The JTPA provides for a partnership between local elected officials and the private sector, which is represented by Private Industry Councils. The Los Angeles Private Industry Council is committed to working in partnership with the county board of supervisors as envisioned in the act. We believe we have a very good working relationship now with the board of supervisors and that our PIC is a vital link between government and the private sector.

The county's current JTPA program, which is the subject of this hearing, was developed during the tenure of the prior county PIC. However, the current PIC did review and approve the county's plan.

In addition, we instructed the county staff to insure that the plan met the legal requirements of both Federal and State law. We were willing to see how the program would work during this 9-month transition period, evaluate the results, and make our decisions with the board of supervisors for the upcoming 2-year plan.

The PIC has begun the planning process for the 2-year plan. The planning process includes the following:

Analysis of unmet employment and training needs of the county service delivery area residents.

Survey of the marketplace to identify potential employers and short- and long-term employment opportunities by industry and specific occupations.

Review of private sector resources available to the program.

Evaluation of a variety of training programs and techniques to determine the most cost effective use of JTPA funds.

And consideration of public input into the planning process.

During this process, we have considered the issue of targeting JTPA resources for general relief participants. At this time, pending more evaluation from this year's program and an opportunity for public input, we have not formulated a final decision. We recognize and appreciate that general relief recipients need employment and training opportunities and we believe that many of these recipients can benefit from training and enter unsubsidized employment. However, because the JTPA funds are so limited, we are carefully considering priorities for service. Our draft plan, which will be the subject of public input and discussion, includes a potential range of JTPA funding which could be used to provide employment and training services to some part of the general relief target population. We expect that our final decision on the plan will be to allocate some, though a smaller proportion, of the JTPA resources specifically to this target group.

Our primary goal during the planning process is to develop the most effective JTPA program possible, with maximum participation by the private sector. We believe that we will be able to accomplish this because our PIC members are absolutely committed to the success of this program.

I want to thank you again for the opportunity to present the Los Angeles County PIC's perspective on the local implementation of JTPA.

If I may, Mr. Chairman, I have a few personal observations that I would like to make at this time.

Mr. **Dymally**. Before you do that, do you have a list of your PIC members?

Mr. **Herman**. I've got one in my briefcase and I'll get it for you as soon as we finish. How's that?

Mr. **Dymally**. Fine. Thank you.

Mr. **Herman**. One of the previous speakers said he wondered how the PIC could approve the current plan. My professional reputation and experience is as a problem solver and, if you will, a fixer. I am accustomed to dealing with issues and problems as they are presented without worrying too much about how they got there.

Quite frankly, when we walked into the room, the private industry council in Los Angeles County, the hand was on the table. It was dealt. We were behind the train. It left the station. What we got was a late entry into the game and we decided we had one or two choices to make, and that was to spend 9 months discussing what we might do to change what had happened in the past, or to accept basically what was there so long as it was legal, deal with it and, based on that experience, attack the problem. We have not had the luxury of a long planning period. But we're not going to duck our responsibilities. We intend to provide leadership from the private sector in this particular opportunity that's presented to us.

Quite frankly, if any of us were timid or politically oriented when we accepted the challenge back in June, we probably, after the first two meetings, would have resigned.

So let's take a look, though, at what we dealt with besides the actual legal hand that was dealt to us. We can't operate in a vacuum. We are facing tremendous competition from the macroenvironment. We are faced with a worldwide economy. Things are changing every minute. We are getting a new influx of women and minorities into the labor force. I've seen a reputable survey that says, by 1995, 75 percent of the new entries in the labor market will be minorities and females. The demands, quite frankly, exceed our ability to supply.

Right now let's take a look at the fact that essentially what we are trying to do is put 10 pounds of product in a 5-pound box. The forecasts about the great economy of the future isn't really realistic. The labor market is going to grow very slowly. Intensive shifts in jobs make it so difficult to predict that what we are training people for today will even exist in the next couple of years. Take, for example, the programing profession. Two or three years ago we in industry spent a lot of our time and resources trying to train people for entry-level programer positions. Technology in the computer industry has increased so rapidly that today it's very difficult to find many jobs available for entry-level programers. That shift was very subtle but very, very fast. Now we have a real problem. There are several occupations like that.

From the standpoint of my personal view of the environment that we face, there is one other thing that we need to consider, and that is a tremendous diversity and fragmentation in the area of training programs. There's a mix of constituencies, there's a mix of motivations. There's a myriad of laws and a myriad of departments that deal with and administer those laws.

I would urge this subcommittee, I would urge all the other persons who represent government at whatever level to work toward a synthesis and a synergy in dealing with those laws. I'm not here to necessarily give my opinion on how those laws impact other people. All I know is that, as a member of the Private Industry Council, we are dealing with fragmentation and we need to deal with a problem that we totally understand and have the ability to move off of dead center.

With that I'd like to conclude my personal remarks and again introduce Mr. Doug Shaw on my left. Doug is with the Mid-Valley Manpower Consortium. Paul Bluto on my right. Paul is with the UAW. Paul is the chairman of our planning committee and Doug is the chairman of our operations oversight committee. They have extensive experience in this area and we'll be very happy to answer your questions.

Mr. HAWKINS. Before that, Mr. Shaw, would you care to supplement the statement?

Mr. DYMALLY. Mr. Herman, in the meantime, could you get me that list because I want to ask questions based on that list that I see.

[Prepared statement of Carl A. Herman follows:]

PREPARED STATEMENT OF CARL A. HERMAN, VICE CHAIR, LOS ANGELES COUNTY PRIVATE INDUSTRY COUNCIL

Thank you for the opportunity to speak to you today on behalf of the Los Angeles County Private Industry Council [PIC] during your fact-finding hearing on the Job Training Partnership Act [JTPA] Program.

The JTPA provides for a partnership between local elected officials and the private sector, which is represented by Private Industry Councils. The Los Angeles County PIC is committed to working in partnership with the County Board of Supervisors as envisioned in the act. We believe that we have a very good working relationship now with the Board of Supervisors and that our PIC is a vital link between government and the private sector.

The County's current year JTPA Program, which is the subject of this hearing, was developed during the tenure of prior County PIC. However, the current PIC did review and approve the county's plan. In addition, we instructed the county staff to ensure that the Plan met the legal requirements of both Federal and State law. We were willing to see how the program would work during this 9-month transition period, evaluate the results, and make our decisions with the Board of Supervisors for the upcoming 2-year plan.

The PIC has begun the planning process for the 2-year plan. The planning process includes the following:

Analysis of the unmet employment and training needs of County Service Delivery Area residents;

Survey of the marketplace to identify potential employers and short and long-term employment opportunities by industry and specific occupation;

Review of private sector resources available to the program;

Evaluation of a variety of training programs and techniques to determine the most cost-effective use of JTPA funds; and

Consideration of public input to the planning process.

During this process we have considered the issue of targeting JTPA resources for General Relief recipients. At this time, pending more evaluation data from this year's program and an opportunity for public input we have not formulated a final decision. We recognize and appreciate that General Relief recipients need employment and training opportunities and we believe that many of these recipients can benefit from training and enter unsubsidized employment. However, because the JTPA funds are so limited, we are carefully considering priorities for service. Our draft plan, which will be the subject of public input and discussion, includes a potential range of JTPA funding which could be used to provide employment and training services to some part of the General Relief target population. We expect that our final decision on the plan will be to allocate some, though a smaller proportion, of the JTPA resources specifically to this target group.

Our primary goal during the planning process is to develop the most effective JTPA Program possible, with maximum participation by the private sector. We believe that we will be able to accomplish this because our PIC members are absolutely committed to the success of this program.

I want to thank you again for the opportunity to present the Los Angeles County PIC's perspective on local implementation of JTPA.

STATEMENT OF DOUG SHAW, CHAIRMAN, OPPORTUNITIES OVERSIGHT COMMITTEE

Mr. **Shaw**. Yes. I would wholeheartedly concur with Carl's remarks, but I want to add something, if I may.

It is very unfortunate that you have been receiving so much negative testimony on this program. In essence, gentlemen, the program can work and the program is working. It is not working in all areas of the county but it is working.

I have a program in the first district in the San Gabriel Valley and I have 230 general relief recipients on that program. For the first time, these people are starting to feel like they've got some self-respect. They are in training programs and they're doing very well. It's got a great deal of potential, and I sincerely hope that you are listening because it's very important that something like this happens. This is the first time in the State of California, and to my knowledge the first time in the United States, that any program like this has been undertaken, and Los Angeles County is the guinea pig in this process and catching all the flack.

But you agree with those that began this program that, yes, it's good to get people off of general relief. Well, it's trial by fire and that's exactly what's happening, but it's going to work. Whether we put JTPA dollars into the program or not, the program is going to succeed because there are enough agencies and people in the county of Los Angeles who feel strongly about this program to make it work. There's a program in an agency called ICI. They train people to be animal license collectors. They collect dog licenses and they get paid by the county animal control program for this. These are general relief recipients who wear a uniform, who have an ID card, who are trained in the program, and who go door to door and they collect licenses for animals.

No. 1, it gives them a job. No. 2, it gives them self-respect. They feel good about what they're doing. It brings in additional revenue to the county. I've heard us two or three times talk about, "This program is only to supplement the county's budget." What's wrong with that? Why is that such a bad thing?

Mr. **Hawkins**. It's against the law. That's what is bad about it.

Mr. **Shaw**. No. What we're talking about here is the fact that the money that you can save in one program will help another program. Instead of having to cut back $5 million maybe you've only got to cut back $1 million.

Mr. **Hawkins**. Mr. Shaw, let me interrupt you. I think we are getting a little afield. We are not opposing a training program for those on general relief. I think I should caution you against that.

Mr. **Shaw**. I understand that.

Mr. HAWKINS. The program that you have referred to may be an excellent program, and I'm sure that it is, as you describe it. We are not opposing that. We are simply saying that the moneys provided under this program, under the Job Training Partnership Act, were not intended to be used that way. That's all that we are saying.

We would encourage the county to use its moneys the way you describe it, but use its money. Don't try to reduce its welfare expenditures by using a program that was not intended to be so used. That's all this committee has jurisdiction over. We don't have jurisdiction over the use of county money in its own way.

I hated to interrupt but——

Mr. SHAW. That's OK. I understand.

Mr. HAWKINS. I agree with all that you are saying. It's just not what this committee is authorized to monitor.

Mr. DYMALLY. Mr. Shaw, the only analogy I want to raise is that, if a poverty program in east Los Angeles or south-central Los Angeles had converted allocated funds for a different project, the director would be in jail today. That's what most of the poverty programs got in trouble for, not for stealing the money but because somebody needed help—he was not into the program and they gave him help. The auditor came and said, "Hey, no more funds. You misused funds." That's basically what happened except you have the umbrella of the county supervisors and the approval of the State. But it's just a misdirection of funds that we are concerned about.

I think all of us are very supportive of training programs.

Mr. SHAW. I realize that. I've heard that very clearly from this committee. However, in a program such as this, if you can derive other benefits from the program, why not do so? Benefits in a sense that it's going to help more people get jobs and/or keep their jobs.

You know, the State of California and the county included, is in a crunch right now as far as their budget is concerned. Why can't we take these programs and dovetail them together? It's a natural. The State of California spends almost $1 billion a year in training programs. They put in $20 million out of general fund money for the general relief program. Under the JTPA program, you can't pay participants' wages. But when you kick in general relief funds, you can use some of those funds to pay wages so those people can live while they are on training. Why not do it? Why not put it together? Why not be creative in this thing and set something up that's going to help people get jobs. And believe me, it is.

Mr. HAWKINS. Mr. Bluto, we'll get your view now.

STATEMENT OF PAUL BLUTO, CHAIRMAN, PLANNING COMMITTEE OF PRIVATE INDUSTRY COUNCIL

Mr. BLUTO. Mine might vary just slightly from what Doug's are.

I think, in general, the total PIC agrees that the kind of program that has been put in place as far as offering the truly disadvantaged people an opportunity to train and to find unsubsidized employment is something that we want to apply. I have reservations about the fact that all of the JTPA funds, or most of them, should be used for that purpose. I believe that the full PIC does. A reflection of that thought is already in the plans for next year. We believe that general relief recipients ought to continue to be included in that program next year, but we don't believe that it should be done at the expense of other people that are just as deserving as the general relief people are.

We think the county ought to continue additional general funds in there to cover what needs to be done for GR's but not exclude all of the other categories of people that would be entitled to the benefit under the law.

I think, really, as far as whether the plan is going to be successful or not, at least as far as I'm concerned, the jury is still out.

But I think one of the things that you may not be aware of that ought to be in the record is how we arrive at what happened this year. I think probably you have to go back to previous years in order to evaluate that, where the county plan included a large portion of the funds to be used to aid the AFDC-U population. We were told at the time that that happened that there were some 2,600 people in that population that the State was no longer going to fund the benefits.

As it turned out, out of the 2,600 people, we ended up with somewhere in the neighborhood of 600 that actually went through the program. As a result of the efforts used, the total AFDC-U population was eliminated as far as the backlog that they had.

So from a county standpoint, that was absolutely a 100-percent success, and I'm sure that that is what parlayed into the program that was developed for the welfare recipients this time around. So, I thought that you should have some background in that because, as far as the AFDC-U population was concerned, the program in the previous year was a success.

The previous PIC, which I was fortunate to be on, also had reservations about utilizing all of the funds for the GR population. As Carl has told you, the new PIC was formed too late in the process, really, to be involved in the planning. They did approve it, said, "Let's give it a try," but I think it was on a contingent basis and with the thought that we're not going to be doing the same kind of thing to the same degree in the next year's program.

I'd be happy to respond to any questions.

Brother Dymally, it's good to see somebody out of my local union here today.

Mr. DYMALLY. Mr. Bluto, do I understand correctly that the new PIC is a continuation or an expansion of the old PIC?

Mr. BLUTO. The answer is "No." There are a few of the people—Doug and I included—that were on the former PIC. I think there's a total of six that were on the previous PIC that are now on the new PIC. But, other than that, this is a totally new PIC.

Mr. HERMAN. That's out of about 19 members.

Mr. DYMALLY. How did you come about organizing the new PIC? I know the law permitted you to organize it, but who said, "I am the leader"?

Mr. BLUTO. From the business standpoint, the chamber of commerce submitted all of the nominations to the county board of supervisors for their consideration on the county PIC.

From the other organizations, such as labor, the names were submitted by the labor groups in the area. We only have one labor person on the Los Angeles County PIC, which is myself.

Mr. DYMALLY. I have to withhold my questions until I see the list because I want to ask some questions about the makeup of the PIC.

Mr. HERMAN. OK. Insofar as how we proceeded from that point, we did the normal process of establishing some bylaws and elected our chairman, the various planning committee members, and the executive committee.

Mr. DYMALLY. Thank you.

Mr. HAWKINS. One of the most difficult jobs that this committee and the Congress had in drafting JTPA was trying to structure a real partnership. It was contemplated that the partnership would consist of the local elected officials, acting through the chief elected official of a county, for example, and the members of the private industry council. The county board of supervisors then would name, upon nomination by the various groups, as Mr. Bluto has indicated, representatives from the various groups and these representatives would constitute the private industry council. But the law clearly stipulates that both partners would be involved from the very beginning, that all of the planning, as well as the implementation, would be a joint effort and that neither one would dominate.

A few weeks ago we were in San Francisco, and Mayor Feinstein has gone the opposite direction. She has literally called in the private industry council and said, "You run the program. You do the planning and you run the program." We were a little concerned about that because it didn't seem to be an equal partnership. We are not sure they're moving in the right direction, however, on making it a true partnership.

Here, 400 miles south, as usual, there's a difference of opinion and the county went the other way.

Mr. DYMALLY. Once again it is as though the north and south are different States.

Mr. HAWKINS. Yes; apparently, according to your own statement, you were in a sense handed something on the table when you walked in, which is purely contrary to what we had contemplated in devising this partnership. That's why it's in the title. And we emphasize that it is a partnership. Neither one is supposed to run the entire show. They are supposed to do things together, not necessarily the way San Francisco did it. Heaven knows that we would never do. The manner in which Los Angeles has implemented JTPA is also questionable. Now somewhere between those two is the correct method. In both instances, two major cities seem not to have developed the plan according to the way the law contemplated it. I think it's a terrible mistake not to involve the private sector from the very beginning because that's where the jobs are. We recognize that when we were drafting JTPA. The focus of JTPA is to train individuals. One of the practical results is that you would be involved in who should be trained, how they should be trained, and the quality and duration of the training.

You've indicated, I think, in a very magnificent way, that we have larger problems in the economy than just the handling of one problem at the local level. We thought that we would have the benefit of the involvement of the private sector. We would have the benefit of your views, for example, and those who think the way you do at the very beginning. Now apparently that doesn't seem to be precisely the way it's being done here in the county. I don't want to be overcritical, but I think that we contemplated this situation could happen. Out of our experiences, we think that if it goes one way too far or the other way too far, it's going to fail. That's why we are concerned about whether or not the local plan is going to succeed. We hope that the county plan involves the private sector. I think Senator Greene correctly characterized what could happen. Can these people be adequately trained in 4 to 6 weeks for jobs that are available in the private sector? Will creaming occur? In other words, we don't want you to take only the individuals who can be easily trained. We want individuals who may be on general relief, but obviously all of them can't come from general relief. We don't want just the ones from Mr. Dymally's district or Mr. Martinez's district. We want them from all over. But we don't see that happening. I just think, to some extent, that if the private industry council is not thoroughly involved in this program, it would be a mistake. It was a mistake not to do so from the very beginning.

Mr. HERMAN. Mr. Chairman, I mentioned that the train had left the station when we got on board last summer. We revisited the subject the second we are on board. I have in my briefcase our draft plan and I would spare you the burden of carrying that back with you right at the moment, but we've gone over that draft plan with representatives of the board of supervisors. We will have several public forums to discuss that plan. I think that participation is there. I wouldn't be so presumptuous as to think that, in every aspect, the private industry council and the supervisors are going to agree. But I think I can guarantee you one thing at this stage of the game. It will be a participative effort this time, looking at the 1984 to 1986 plan, and that we will, in fact, have had enough time to take a look at it and it will represent our best effort as a private industry council, and we'll let the chips fall where they may.

Mr. HAWKINS. Mr. Martinez.

Mr. MARTINEZ. I would like to mention a couple of things.

One is you did come in late, but one of the things that you were supposed to do was to develop or provide for the whole plan the kinds of job training that was needed, and that I assume means the jobs that there was a need for people.

One of the cruxes of the problem with what the county has done, and maybe that which was mandated to you, is to force people who were on general relief to make themselves available for job training or not receive that benefit.

It sounds to me like you're pretty astute about business and employment training but it doesn't seem that it would be productive in the long run to force somebody into a job that he doesn't want. It doesn't give a program a very great of a chance of success to train a person for a job they don't want and then expecting to keep that person in that job for a long period of time. After all, it's a basic thing that a person has to enjoy what they are doing or they're not going to last very long at it.

As I mentioned before, the people that were laid off at Bethlehem Steel who had worked, let's say, since the Korean war—

they're not that old; they're 51, 52 years old, and they still see a whole work career ahead of them but their work career in what they had has been cut short because of the closing of an industry. There's Huffy Bicycle, which is another one. There are several instances that I can—the Ford Motor plant out in Pico Rivera is another one. So those people have a track record of willingness to work, have a track record of being a provider of a household—the chief provider of a household, and wanting to, needing to—if you take 12,000 people and put them where there are 9,000 slots of general relief people, what does that leave you for those other people? In this program there was a definite set-aside for the youth which should not be included in program statistics. If you exclude that from their figures, then what you have is over 50 percent of the money going to general relief people, which—I agree with Mr. Shaw. There is a need for it and it does provide a lot of these people, but I'm wondering if—let's say a guy who was in steel work is going to be willing to work going door to door for as long as it lasts in dog licensing. The only reason I refer to that is that here again I'm talking about taking people that have aptitude for a certain thing and training them for a certain kind of a job since a whole part of the plan was to find specifically what jobs were needed and find the people that were in need of retraining because now they've exhausted their unemployment funds and now they are going to be welfare recipients. To say that the degradation to these people who have been, like we say, primary bread winners in a household—the degradation because—as we went through different parts of the country on hearings about what happened to people when plants have closed and they've lost their jobs, that the head of the household—how degrading that is to them and what it lead to, alcoholism, child abuse, wife abuse, sometimes even suicide.

So, thinking that there were a lot of people like this that needed this, that was the program—what it was enacted for. Now we find in Los Angeles County—I'm very concerned about what Bill Greene said, that, if we allow Los Angeles County's JTFA program to continue as it was, there are six entities willing to jump into that same kind of a situation. I don't think we can allow it because that wasn't the intent of the law.

Mr. HERMAN. Let me take the forward view for a moment and then possibly Paul or Doug would like to respond to your question as well because of their roles in the planning and operations committees.

Our intention in forging the 1984 to 1986 plan is essentially to overcome some of the problems that you have indicated. Yes, there was a disproportionate share, if you will, of the activity and the resources dedicated to the general relief population.

Do we need to target more carefully on the specific jobs that are available? I don't think there's any question about that.

In looking down the road, and you, gentlemen, in your particular roles in Government know too that, when we start talking about increases in the labor force, that really is very, very deceptive. As a matter of fact, the labor force is only going to grow essentially in a very limited number of the so-called 1,200 or so demand occupations that are classically used. The growth may occur in as few as

40 of those 1,200 so-called demand occupations. What I'm saying is, it doesn't do us any good to know that the medical profession is going to be a rapidly growing occupation or occupational category for the next 15 years because I don't think it's our responsibility to train doctors, nurses, and medical technicians. I would guarantee you it would not take 4 weeks to do that. If it does, I don't ever want to visit a hospital again.

The problem is that we have to prepare people for basically entry-level positions. I agree with you, Mr. Hawkins, there's an easy way to do some of this and that's creaming. That's not our problem either. We don't want to do that. We have a dislocated worker problem that you referred to so completely and accurately. We think that it's our obligation as a Private Industry Council to take a look at the various audiences that we need to serve and in some correct proportion identify who they are and try to match them with the available jobs and not try to delude you or ourselves in saying that we are going to be able to place everybody because there just ain't enough jobs to go around.

Paul, as a member of the planning committee, would you care to respond?

Mr. BLUTO. Well, you've known me long enough to know that if you ask me to say something, I'm going to say something.

I'd like to respond, Congressman, to your concern about displaced workers. As you are probably aware, the United Auto Workers is one of the forerunners in this type of thing where we saw in the General Motors negotiations last time, which was, as far as I'm concerned, misnomered as saying concession bargaining. We put 5 cents an hour aside to retrain people, and in the State of California, the Southgate program was one of the first ones. We've got several of those programs going on in Los Angeles County.

The other thing that I don't think we can overlook as far as placing people is concerned, is when you have 10 percent unemployment—and, as far as I'm concerned, closer to 20 percent of the labor force are unemployed in this country—a lot of those are people that are trained, have work ethics and all of those types of things, and we try to place people that have had no work experience in those kind of programs, we're like a fish swimming upstream to start with.

The real key to this thing in the long run is going to have to be that we recognize we can no longer afford to pay people in other countries to build things for us and pay people here in this country for not building them because the displaced workers are really fairly easy to place with some retraining. You don't have to train them how to get up and go to work each day. We've had tremendous success in finding other jobs for them and we will continue to do that.

The auto workers in the State of California have lost over the last 3 years the Pico plant, the Southgate plant, the Fremont plant, and the plant in Milpitas. So we have been devastated from the standpoint of auto workers. There is certainly retraining needs in that industry.

I think that the Congress has to give more consideration than they already have to retraining needs. But we need to find new jobs for these entry-level people or we are going to have to use on-the-job training type funds in order to encourage employers to put these people on because, otherwise, they're going to hire somebody who has had experience somewhere else and they're not going to take these people with no experience and put them into a full-time job.

Mr. Dymally. Mr. Chairman.

Mr. Hawkins. Mr. Dymally.

Mr. Dymally. I must confess that, after having examined the membership roster, a little steam has been taken out of my question. I notice there are five members from the 31st Congressional District on the council.

Mr. Herman. You're well represented.

Mr. Dymally. Yes. One of my labor friends, Urban League, two women. So I withdraw my question.

Mr. Herman. I'd like to respond to that, especially since I had nothing to do with the composition of the PIC. This is not a commercial. I think that the composition of the Los Angeles County PIC—by special interests, be it labor, business, or the educational community—is a good balance. I would guarantee you, gentlemen, that there is good participation. The three of us sit here today, as the three of you are sitting there, and we are very cooperative. The shirts we wore the other day are blood, and we argue among each other and we have a diversity of opinion. I think we try to bring that, you know, to the deliberations. That's why, as I think all of us have stated, we're committed to make this thing work.

Mr. Dymally. Mr. Herman, who is your PIC chairman?

Mr. Herman. Berwin Fragner. He had been involved in the previous PIC and he's a vice president with TRW in the human resources field.

Mr. Bluto. Let me correct that. He wasn't involved with the previous Los Angeles County PIC. He was involved with the Los Angeles City PIC.

Mr. Shaw. One of the things that you're hearing here is that, we, as members of the Private Industry Council, are equal partners with the board of supervisors, and I emphasize the word "equal."

Mr. Hawkins. Well, you are now but——

Mr. Shaw. Well, originally when we came in——

Mr. Hawkins. You should have been involved from the beginning.

Mr. Shaw. Agreed. Agreed. It would have been nice, but——

Mr. Hawkins. Maybe we wouldn't have had this hearing.

Mr. Shaw. Well, there were time constraints and so forth, but we won't get into all of that stuff.

I'd like to address a couple of brief issues. I realize we're getting too long here.

Regarding those people that are being forced from the general relief roles into the training programs, the majority of these people want training. They want to go into that training program. That is one of the reasons why you are seeing that we originally had slotted for 10,000 people; there are now over 14,000 people. Those general relief roles are getting larger.

My feeling is, and I cannot substantiate this, but my feeling is that the reason that they are getting larger is because more people want to get into training programs and they want to get jobs. They don't want to be on welfare. They want to work. That's encouraging for me.

It's also encouraging for me to see that these other six counties are taking a look at it. I would love to see training programs evolve instead of welfare programs evolve. I think the year or the era of welfare is over and I think we're coming on a time when we're talking about developing training programs, taking people and getting them off of those roles and putting them into work where they feel like they are a part of the society and not just bystanders or observers.

One last statement. The Private Industry Council does not in any way, shape or form condone or agree with the idea of putting all of the JTPA dollars into the general relief program. This coming year we are looking at a portion. Now what portion that is we do not know yet. We haven't even received the success results on how the program is operating right now. We all sit here talking about this stuff, but there are no statistics to show us in essence how many have been placed. We know there have been problems. Oh, yes, definitely there have been problems, but we don't know how successful the program really has been. So we want to take a look at that and we want to see how successful has it been. Then decide, along with the board of supervisors, how much money realistically to put in the program.

Mr. MARTINEZ. Mr. Chairman.

Mr. HAWKINS. Mr. Martinez.

Mr. MARTINEZ. Doug, you know, I agree with you wholeheartedly. You made a statement right now that— I'm glad that you made it because it's been a fallacy for a long time—that welfare recipients are there because they want to be. There is a percentage of welfare recipients on the rolls there because they want to be, but the big majority of them are there because they have no other choice, and those people do have an intense pride. I grew up during the depression. I was born in 1929 and I can remember that my dad, as proud as he was, accepted help because he had no other choice. There was absolutely no work available. With our hat in hand we were always treated very abusively. So I don't think that anybody wants to ask for a handout. But the present administration disagrees—two of them have made a statement—the President himself said that people are homeless because they want to be homeless. Ed Meese said that people go to soup kitchens because they're lazy. Now that's blind. That's just utterly blind. I think at least you've seen it in your experience here that those people that do get the available training get a JB—the key is that they want it. When you force people into training and mandate, "You either go or you don't get that check." That is not the intent of the law and it should not be a part of the program. People realize the net worth of job training. They realize the net worth of it to themselves and their families.

Mr. HAWKINS. I suppose that's a good point on which to end this panel's discussion.

Thank you again, gentlemen.

Mr. HERMAN. Thank you for the opportunity to come before the committee.

81

Mr. **Hawkins**. The next panel is the California State Job Training Coordinating Council consisting of Mr. Theodore Bruinsma, who is the chairman, and Ms. Barbara Pearson, a member of the council.

Ms. Pearson, it's a pleasure for me personally to welcome you. We've known each other for an extremely long time. About the only thing I have negative about you is that you are with USC and not UCLA.

Ms. **Pearson**. Thank you.

Mr. **Hawkins**. But we are pleased to welcome all of the witnesses.

Mr. Bruinsma, I suppose you are the lead-off witness.

Mr. **Bruinsma**. Yes, sir.

STATEMENT OF THEODORE BRUINSMA, CHAIRMAN, CALIFORNIA STATE JOB TRAINING COORDINATING COUNCIL

Mr. **Bruinsma**. Mr. Chairman, my name is Ted Bruinsma and I am the chairman of the State job training coordinating council.

With me today, in addition to Ms. Pearson, is Michael Riley on the far right, who is our executive director, and Karl Grossenbacher. Karl works for the employment development department [EDD]. The Governor has appointed EDD as the administrative agency for this program.

I have a prepared statement submitted, but, having heard some of the testimony, I'd like to just submit that statement and make a few very brief remarks.

First of all, I could not in any way disagree with the philosophy, Mr. Chairman, that you expressed a few minutes ago, not only with regard to the purpose of this act, but also in the way in which it is supposed to work. I think I can testify that the Governor believes in the philosophy and also believes in the true nature that, if this program is going to work, it must be a partnership. I can share experiences where he has, in fact, exercised through us the clout in order to make sure that the kind of problems that you indicated before do not exist, because, if they do exist, the partnership will not work.

You also indicated that you experienced a different concept in San Francisco from Los Angeles, and I want to tell you we have 50 service delivery areas that we have designated, and we probably have 49 different approaches. But it is our philosophy to use the strength of our position. We have set up an informal appeal decision in order to bring to our attention those areas so that we might use our persuasion to see that the members of the Private Industry Council, the greatly diverse people led by their private sector, are in partnership with the chief elected official.

My own experience is that we started late in California and we're catching up very fast. Some of the problems that you referred to come about because, No. 1, we did start late, and, No. 2, we've been too involved in the nuts and bolts of making submissions and allocations of plans and we haven't gotten down to the basic concepts of training. It's been difficult throughout the State, but we have some very dedicated people working on it who really

8

believe that the end result of this is to get people off dependency and into the real world.

We've had several symposiums statewide here in California trying to get input from the bottom up so that we know what the people in the field are thinking with regard to the problems they are facing. You mentioned the one problem, the lack of partnership. It's also the problem of too much paperwork and we're working at that.

I think that we're going to have a very good program in California and I think the situation in Los Angeles County is a bit unique because here in the county you have not only the county in Long Beach and Los Angeles City as being separate SDA's, but you also have consortiums within the county so that the county has responsibility for public assistance in all these areas, but yet some of the authority in the SDA's is taken away from them.

I have met recently with the supervisors. I met just this week with the chairman of the PIC who couldn't be here today, and also with Mr. Galloway who testified earlier. I think we are working on these problems and I think we're going to have a program that does work and one that is very consistent with the philosophy that you have expressed.

Thank you.

Mr. HAWKINS. Thank you. Ms. Pearson.

[Prepared statement of Theodore Bruinsma follows:]

PREPARED STATEMENT OF THEO A. BRUINSMA, CHAIRMAN, CALIFORNIA JOB TRAINING COORDINATING COUNCIL

Chairman Hawkins, members of the subcommittee, my name is Ted Bruinsma and I am chairman of the California Job Training Coordinating Council. I appreciate the opportunity to discuss with you the philosophy of the council as it applies to local plans.

You are aware that the council established five "area" committees to work with the technical staff of the employment development department in reviewing the plans of each of the 50 Califorinia service delivery areas. Based upon these reviews, the committees either recommended the plans for approval by the council and the Governor, or advised the SDA regarding deficiencies in the plan that must be corrected before approval would be recommended.

The Los Angeles County plan was one of those sent back for adjustment before approval could be given.

Our council had established an early standard for carrying out what we perceived to be the intent of the Congress in regard to the autonomy and flexibility of local partnerships. We conceive of the State role as one of facilitating local delivery systems and encouraging coordination among contiguous SDAs. This role is effected by setting policies and standards and then evaluating their impact and effectiveness in operation.

With 50 service delivery areas, we certainly have a valid sample on which to test the efficacy of our decisions.

Los Angeles County is an unusual situation both in California and, I suspect, in the country. Under the provisions of the JTPA, three service delivery areas are mandated in the single labor market. The cities of Los Angeles and Long Beach and the county each exceed the 200,000 minimum population which grants a local unit of government status as an SDA. Additionally, five consortia of cities were approved as separate SDAs within the county.

Of the eight SDA's, Los Angeles County is the only one which bears the responsibility for delivery of welfare services to the county's residents. Persons eligible for public assistance are often residents of one of the seven city-based SDA's as well as of the county. It is not unreasonable for the county to plan to serve a disproportionate number of public assistance recipients within their job training program.

However, to the extent that such a plan and its implementation results in other eligible segments of the county's population not being served equitably, the plan becomes questionable. As you will hear from Karl Grossenbacher, the county's service levels, while out of balance, indicate a commitment to serve all segments of the eligible population.

In an ideal world, the eight service delivery areas would agree to coordinate their service delivery in such a way that every eligible person within the county would have an equal chance at service from one or another of the programs. If the county took on the responsibility for providing job traning service to the public assistance recipient population of all SDAS, the other seven would reciprocate by providing a proportionate amount of services to county residents eligible for job training who are not on welfare roles. We understand that the county intends to work out agreements along these lines with other SDAS.

If we were able to implement a "Labor Market" plan which assigned each SDA a role comensurate with its specific population plus a responsibility to interact with the county in a proportional manner reflecting the SDA's population of public assistance recipients, the combination of the eight plans might reflect a balanced level of service to all segments of the population although an individual SDA's statistics might be skewed from the norms.

While we believe that the Governor has considerable authority to adjust for State needs and conditions, we feel that the provisions in the JTPA that mandate service levels for youth, for school dropouts and for AFDC recipients, prevent the inter-SDA coordination in the degree I have suggested.

We are slightly more than 3 months into the implementation of the Job Training Partnership Act in California. At our conference in January, attended by more than 600 persons from all walks of the JTPA life; PIC chairs and members, local elected officials, educators, SDA administrators, labor and community organization representatives, and others, there was a spirit of enthusiasm, a definite attitude of "we can do it if you'll keep the bureaucracy off our back."

As chairman of the California Council, I will say to you that California, including Los Angeles County, can make the JTPA work better than you hoped. Just give us the chance.

STATEMENT OF BARBARA PEARSON, MEMBER OF CALIFORNIA STATE JOB TRAINING COORDINATING COUNCIL

Ms. Pearson. Thank you, Congressman.

Like Ted, I've submitted a written statement, but, in view of what we have heard today, I think a lot of it would be redundant.

I am a member of the State job training coordinating council. I was one of those who had to be approved by the Senate Rules Committee. I think the public members had to be, so some of us had to be approved. I have a letter from Mr. Roberti——

Mr. Dymally. And they didn't reject you?

Ms. Pearson. No. They let me in, Merv. [Laughter.]

I'd like to touch on something which isn't on the agenda but which the Congressman alluded to earlier. CETA could have worked. From personal experience I know the legislation was good. It was all in place. I think in certain areas of the country it was abused by service providers and by people at the local level.

As Gus mentioned, I'm at the University of Southern California. I'm their affirmative action officer. Back in the beginning of CETA, I was asked by the State and then by the city if we couldn't bring these programs into USC as a way to bring people from the community into a private institution. In the last 10 years we've placed over 1,200 people, and not just in entry-level jobs. Some of them are quite highly placed now. So I know these programs can work.

We didn't have our first council meeting until the middle of May because the implementing legislation had not been approved. We had our first meeting in the middle of May and the chairman, Mr. Bruinsma, in order to expedite our workload, appointed subcommittees for each region of the State. I was on the one in charge of reviewing southern California. In fact, we met right across the hall and I attended every meeting.

Our first meetings were hearings on the composition of SDA's and many of these had not been the prime sponsors under CETA. So it was an interesting experiment.

After the SDA's were approved, we had to approve the PIC composition. October kept galloping toward us. We were meeting several times a month and weekly in our case, and some of the hearings were open. Finally, we had to approve the submissions from the SDA's for the 9-month plan. In some cases we found deficiencies, not just in the county of Los Angeles. That was the one we were most concerned about. But we felt that, in order to have the start-up by October 1, it was incumbent upon us to recommend to the council approval with certain specified deficiencies that had to be eliminated from various plans, and that's what we did.

My spot on the council is to represent vocational education and services to youth, so I found I had a readymade large constituency out there who kept me informed about things from their viewpoint. This is one reason I've been so concerned about Los Angeles County, because, as we have heard today, they recognize they have problems. The service providers have had problems, but every effort humanly possible is being made to correct these problems.

I think that we should be given a chance to make this program work. We're only about 5 months into the program. The 2-year planning cycle is coming up. I know that it's high on the Governor's agenda to make this program a success, and those of us who are on the council, as well as our staff, are really dedicated to training people and getting them jobs. With your support and help, I think we can make it work.

Thank you.

Mr. **Hawkins**. Thank you.

Mr. Bruinsma, who is the next speaker?

Mr. **Bruinsma**. Mr. Grossenbacher, sir.

If you will excuse me, sir, I'm going to have to leave.

Mr. **Hawkins**. You may leave.

Mr. **Bruinsma**. But I have a good representative here.

Mr. **Hawkins**. We appreciate your statement. Your testimony will be entered in the record at this point. We congratulate you on making a great effort to make this program work.

Mr. **Bruinsma**. Well, thank you. I think your inquiry this morning, as I've heard it, is helpful, but I also think we're on the same track and I think we're going to show that California is going to have a great plan.

Thank you.

Mr. **Hawkins**. Well, the three of us are from California, so we'll be back.

Mr. Grossenbacher.

[Prepared statement of Barbara Pearson follows:]

Prepared Statement of Barbara Pearson, Member of California State Job Training Coordinating Council

Chairman Hawkins, members of the subcommittee, good morning. My name is Barbara Pearson, and I served on the subcommittee of the State Job Training Coordinating Council which reviewed plans submitted by SDA's in Southern California for the first nine months of implementation of the Job Training Partnership Act in California.

Because of a delay in required State legislation, the Council did not have its first meeting until the middle of May 1983. This meant a very tight schedule for the Council in order to approve recommendations for submission to the Governor concerning SDA designation, PIC membership, and nine-month plans in time for the JTPA startup of October 1, 1983.

Responsibility for making first stage recommendations to the full Council was divided between five subcommittees. Public meetings were held on each component of JTPA. Because the position I fill on the Council is designated to represent Vocational Education and Services to Youth, I began receiving communications from service providers complaining about the Los Angeles County Plan even before the Subcommittee meeting to review the proposed plan. The primary focus of the complaints was the decision to serve only General Relief recipients and the elimination of services to youth aged 16 and 17.

At the Subcommittee meeting, it became evident that a number of the plans being submitted had deficiences. In the interest of time, under pressure to get the recommendations for approval to the full Council and then the Governor in time for the October 1 startup date, these plans were given conditional approval subject to modification.

The County of Los Angeles presented a plan which had serious deficiencies. The most glaring problem with this plan was the declared intention of serving only General Relief clients. Upon direct questioning by members of the subcommittee, the County representatives affirmed their intention not to serve AFDC recipients, clients of the Department of Rehabilitation, and other eligible persons unless they were also GR recipients.

The members of the subcommittee unanimously rejected this type of planning and declared that the LA County plan would not be recommended for funding unless changes were made to comply with the intent of Congress as expressed in federal law.

There were other deficiences than the requirement concerning clients to be served. These included the lack of an agreement between the PIC and local elected officials, participant levels, plus lack of a process for selecting service providers. In addition, the subcommittee felt that the proposed 22 percent placement rate was too low when all eligible client groups were identified. Subsequently, the County deleted the reference to serving only GR recipients, by implication indicating that the plan would respond to the requirements of the law. Other conditions were met, including an adjustment in the placement rate to 36 percent. Inasmuch as the Secretary of Labor had not yet established placement standards for the 9-month period, the subcommittee had no guidelines on what placement could be mandated.

After the changes were made, the Council recommended that the Governor approve the County plan. This was done.

When complaints from service providers continued, the matter was brought to the attention of the State Council. Mr. Ted Bruinsma, chairman, ordered EDD to conduct an immediate investigation. The investigation, conducted under the guidance of Mr. Karl Grossenbacher, who will address you shortly, indicated that the LA County plan was legal under JTPA legislation and implementing regulations.

The State of California has 50 SDA's, many of them new consortiums with no prior experience as CETA prime sponsors. We are less than half way through the initial 9-month period of JTPA. Problems are still being ironed out as the transition from CETA evolves. Preliminary reports indicate that the problems are being monitored and technical assistance given where needed. Staff and the volunteer Council members are spending untold hours working to make JTPA successful. The Governor has stated that job-training has the highest priority on his agenda.

On January 31, 1984, the Secretary of Labor issued new standards for evaluating JTPA. These will provide additional guidance to the Council as the 2-year plans are submitted.

JTPA appears to be a very carefully thought-out vehicle to provide federal funding for the training of eligible participants. Real jobs as opposed to make-work will lead to long-term satisfaction for participants plus a decrease in welfare expenditures. The cooperation between business and local government promises to provide the partnership envisioned by Congress that will benefit the entire country.

All of us who are involved hope to be able to convincingly demonstrate the success of the partnership before the conclusion of the next funding cycle.

STATEMENT OF KARL GROSSENBACHER, CHIEF, JOB TRAINING PARTNERSHIP ACT OFFICE, EMPLOYMENT DEVELOPMENT DEPARTMENT, STATE OF CALIFORNIA

Mr. GROSSENBACHER. Thank you.

Mr. HAWKINS. May I personally say that we enjoyed the cooperation and support that you gave to this group a few weeks ago in Sacramento and also the help that you have given to the staff over a long period of time.

Mr. GROSSENBACHER. Thank you.

I have provided a prepared statement to the staff and I would like to present it to the committee because I think it does provide some information different from what you have heard so far.

I am Karl Grossenbacher, chief of the Job Training Partnership Act office in the employment development department which, as Mr. Bruinsma indicated, has been designated by the Governor as the administrative agency for JTPA at the State level.

I've been asked here today to provide testimony with respect to the procedures used by the State to assure compliance with the act and to address the findings of the director with regard to a complaint filed by the Western Center on Law and Poverty about the Los Angeles County service delivery area plan.

I'd like to emphasize that the Job Training Partnership Act has been operating for only 4 months and that the program in California does appear to be off to a good start.

The data available indicates that it is operating effectively, even though in some areas we do have the kinds of startup problems that one would expect in a program of this magnitude in a State as large and diverse as California with, as was mentioned, 50 service delivery areas.

JTPA represents a change in focus for employment and training programs funded by the Federal Government in that it is clearly tied to performance standards. When we're dealing with adults, those performance standards all relate back to one key factor and that is the number and percentage who enter employment.

To specifically address the areas that have been requested by the committee, the system established in California to assure compliance with the act has six major components. First, the review of job training plans by the employment development department staff and by the State job training coordinating council, with final approval of those plans by the Government; a fiscal management system, a management information system, a field liaison unit that monitors service delivery area program administration, an audit system to insure that funds are appropriately expended, and then the director's independent investigation under State law.

The purpose of the fiscal management system is to insure adherence to generally accepted accounting procedures, including cash management requirements on the part of service delivery areas.

A key goal of that system in this transition year is to insure that the Department of Labor's very stringent standards relative to cash on hand are adhered to.

The management information system collects and collates data on participants and program management, and it is submitted by service delivery areas to the State.

During this current transition year, most of the SDA's in California report quarterly, using hard copy. As we move into the first 2 full program years, we will have an automated system that will allow us at the State level to monitor their programs more closely and to provide greater detailed information to oversight bodies such as this one.

The field liaison staff is a very important point of reference for us. It provides our face-to-face contact with service delivery areas. It provides us with an opportunity to look at their programs directly in a hands-on way. We currently have 10 staff members engaged in that activity in California. They visit each service delivery area on a quarterly basis, using a very comprehensive and detailed monitoring guide that we have developed that we will provide to the committee staff.

The audit system that we are currently developing is basically composed of two components, the preawards surveys that were conducted of all service delivery areas to insure that they have adequate systems, and then the followup fiscal compliance audit which will be conducted at least every 2 years as required by the act. We are working in the Job Training Partnership office closely with the State council to develop our audit program and plan, and parenthetically we have the assistance of an audit advisory committee composed of representatives from audit firms, local service delivery areas, and other groups in the development of our audit system, so we feel that it will be a good system.

The State implementing legislation that has already been referred to earlier this morning, the Family Economic Security Act, provides a mechanism by which the director of EDD can conduct an investigation whenever there is a complaint that a service delivery area plan or program operation is contrary to the law. Under that authority, he must make a finding within 60 days of receiving the complaint.

Looking for a moment at the overall program, in the first 3 months of operation, that is through December 30, the 50 California service delivery areas enrolled 18,574 participants. That is 25 percent of the total planned participants for the full year. Now that's 25 percent of the participants in 33 percent of the time, but, if you take into account that we're in an implementation phase, I think that it illustrates that the service delivery areas are doing an outstanding job of getting their programs online.

What is even more satisfying from my perspective is that 4,414 individuals have completed programs or have been terminated. Of those, 70 percent or 3,123 have entered employment. So I think that our service delivery area administrators and private industry councils, which are responsible for the implementation of programs, can take pride in what they are doing out there on a statewide basis.

The complaint filed by the Western Center on Law and Poverty was reviewed by the director under the authority granted to him by the Family Economic Security Act. He conducted an investigation, as was required by the act, and looked primarily at two issues that were raised by the complaint.

One was that the plan was improperly developed and approved at the SDA level. The second was that the plan, pursuant to JTPA, improperly targets general assistance recipients.

Based on his investigation, the director found that the Federal laws had been appropriately complied with.

In that regard, I also wanted to briefly cover the actual approval process for the Los Angeles County plan. The plan was first reviewed by Job Training Partnership office staff, and that staff review identified the fact that, as originally proposed, the plan did not indicate that service would be provided to some of the non-general assistance groups for whom service is required under the act. That fact was brought to the attention of the State job training coordinating council review committee. That committee imposed four conditions which had to be satisfied before the plan could be approved. Those conditions were that the narrative of the plan had to reflect appropriate service to non-general assistance recipients; that the agreement between the Private Industry Council and the chief elected official had to be submitted along with the plan; that the plan had to describe the process for the selection of service providers; and that the statistical tables with the plan had to be modified to conform to the new narrative that was required under the previous condition. Those changes were all made prior to the approval of that plan, so that the plan does meet the requirements of the Job Training Partnership Act.

In California we are administering JTPA in a manner consistent with the Federal laws and regulations, especially those provisions that impose certain limitations on the power of the States to direct the service delivery areas in the development of their program.

Under the act, plans may only be disapproved by the State under five specific circumstances. The first is where corrective measures for audit deficiencies have not been taken. The second is where the entity proposed to administer the program does not have the capacity to administer the funds. The third is where there are inadequate safeguards for the funds. The fourth is where the plan does not comply with the particular provisions of JTPA or the Secretary of Labor's regulations. The fifth is where the plan does not comply with the specific coordination criteria contained in the Act.

In addition, section 121(b)(1) of the act precludes the State from infringing on local discretion in the selection of participants for the program. The Los Angeles County service delivery area plan was approved because it did not violate these particular criteria.

In closing, I would like to emphasize that, based on the data currently available, as I've already indicated, the program appears to be off to a good start in California. As with the other members of the panel, I would be more than happy to answer any questions.

Thank you.

Mr. HAWKINS. Thank you, Mr. Grossenbacher.

Inasmuch as your testimony deals with compliance with the act meeting the requirements of Federal law, let me ask you several questions.

What was the basis for determining that the county would provide equitable service to the significant segments of the eligible population when the plan on its surface provided absolute priority to general relief clients, virtually no service to the youth, and significant under-representation of Hispanics, women, and others?

Mr. GROSSENBACHER. Well, the plan, as approved, provided that 52 percent of the participants would be Hispanic, for example. The plan, as approved, provided that 32 percent of the participants would be females.

Now, the operation of the program, I believe, contemplates that these figures will be derived not exclusively from the general assistance population. We looked at the plan enrollment percentages and concluded that the county was not unlawfully excluding any significant segment. We did not reach the issue of whether they were getting these people from general assistance or whether they were getting them from some other component of the population.

Mr. HAWKINS. Do you think they can comply with the requirements of the act in the manner in which they are going? Are they, do you think, in compliance?

Mr. GROSSENBACHER. We believe that the plan is in compliance. We believe that the Los Angeles County has encountered some management problems in the implementation of the program. They have had many more general assistance recipients descend upon or be referred to their program than they had originally planned. As a result of that, they do have some imbalances as compared with their plan in their intake to date. But again I would emphasize that they have only been through one-third of the time period during which this plan is operative and I do not know that we have reached a point at which we could say that they are not operating in compliance with their plan.

Mr. HAWKINS. Do you believe that, under the circumstances of confining their selection to general relief recipients, they can possibly reach those goals when that category discriminates against the very people who are required by law to participate? In other words, do you think you can get a square out of a circle?

Mr. GROSSENBACHER. It is our hope that they will get a circle out of a circle. We have conducted a visit in the Los Angeles County service delivery area and are bringing to their attention--and I think they are already aware of it themselves—the fact that they need to do a better job of reaching out to some of those nongeneral assistance groups. They have indicated that they will be sending a program letter to their program operators, to their service providers, directing them and providing them with some advice on how they can recruit larger numbers of non-GA participants. If that does not happen, we would, I think, then become concerned that they would not be able to meet the goals that they have laid out. Our observations to date indicate that they are attempting in a good faith way to deliver, based on the goals that they committed to in their plan.

Mr. HAWKINS. Let me ask you a second question because I don't agree with your optimism on the first one.

Did the State grant a waiver to Los Angeles County to permit a 32-percent placement rate?

Mr. GROSSENBACHER. The answer is "No." The performance level in their plan is based on the demographics of the groups that they are planning to serve. I'm sorry. I don't have it on my fingertips what their entered employment requirement is or how that was computed. But we did not grant them a waiver to have an entered employment rate below what would be required under the performance standards.

Mr. HAWKINS. But it is contained in the plan which was submitted and the narrative which was submitted. I assume you saw it.

Mr. GROSSENBACHER. Yes.

Mr. HAWKINS. And you did not call attention to it. You did not grant a condition on it. So, in effect, you granted a waiver, haven't you?

Ms. PEARSON. Can I answer that?

Mr. HAWKINS. Ms. Pearson.

Ms. PEARSON. When they submitted the original plan to the subcommittee after establishing that they only had 22 percent placement, which seemed very unreasonable, particularly when the city of Los Angeles had a much higher percentage, we pointed out very strongly that that was an unacceptable use of the funds. I believe they later came back with 36 percent. Am I correct, Karl? But that was picked up right away. They weren't given a waiver for that 22 percent. We just received last week the Department of Labor's standards that were required by the act for placement for the 2-year period. Prior to that we really didn't have anything that we could get a handle on. People were coming up with varying placement rates in different parts of the State, and that was a problem because we didn't have the authority to say, "Well we're not going to approve you unless you change your placement rate."

Mr. HAWKINS. Well, you might have encouraged them to change it.

Ms. PEARSON. Well, we did, and they did change it. So what?

Mr. HAWKINS. Well, it still doesn't really prove to be satisfactory. Let's move on to one other question.

Why was a proposal to provide service to 39 percent of the participants who reside outside the SDA area approved when the law itself allows for only a limited exception, and certainly this cannot, by any stretch of the imagination, be considered a limited exception?

Mr. GROSSENBACHER. We do agree with that definitely.

Mr. HAWKINS. Well, we came to some agreement, then, didn't we?

Mr. GROSSENBACHER. Yes, sir.

The plan indicates that the county service delivery area will work out cooperative agreements—I believe they used the word "agreement" not "cooperative"—with the other service delivery areas in the county so that there would be a total balance in service to general assistance recipients and nongeneral assistance recipients throughout the county area.

In addition, when the director conducted his investigation under FESA of the Los Angeles County plan, our agency was informed that the county would be paying for the services to the nonresident GA's out of county funds rather than out of Job Training Partnership Act funds. We have not, as of yet, received the fiscal reports from the county that will enable us to determine whether that is, in fact, correct or not, but that is the commitment that the county has made. One, to the extent that they do not do it out of county funds; it will be pursuant to inter-SDA agreement. Two, that it will be out of county funds.

Mr. HAWKINS. How was this agreement made?

Mr. GROSSENBACHER. To our knowledge, the agreements have not yet been reached. The commitment in the plan was that they would reach agreements. In addition, as I indicated, they have made the further representation during the director's investigation that the nonresident GA recipients will be served using county general fund money rather than JTPA money.

Mr. HAWKINS. We'd like to see the agreement whenever it's reached. We'll hold it in abeyance for that, at least, as not being in violation.

Mr. GROSSENBACHER. Yes, sir.

Mr. HAWKINS. Would you agree that the county plan on its face proposes to substitute Job Training Partnership Act dollars for the county dollars? Is this not in violation of the law?

Mr. GROSSENBACHER. I don't believe that, on its face, it does that. As was stated earlier by one of the preceding witnesses, the county has not engaged in job training efforts of this magnitude for general assistance recipients in the past. Therefore, I do not believe that there is an issue of surplantation that has arisen here.

Had the county been operating a GA training program before JTPA, using county funds, and had they stopped that program and put a JTPA program in its place, then there clearly would be such an issue.

Mr. HAWKINS. Are they not using Federal dollars for what they had previously used county dollars for?

Mr. GROSSENBACHER. I am unable to respond to that question specifically because, as I indicated, we have not yet received the fiscal reports from the county. However, again going back to earlier testimony, I do recall that one of the witnesses indicated that the county is putting $1.75 million of county general fund money into the program. So, based on that, it would appear that, rather than removing county dollars, they are contributing county dollars to the program in the ultimate hope that, by getting people trained, they will be able to get them employed and thus save county money by reducing the general assistance rolls.

Mr. HAWKINS. Can you say that this money, which they are using, is in addition to a service which they would have provided for a client of people that would have had the sole responsibility for in the first place, even if we had not had a JTPA program? In other words, is not the general relief client a responsibility of the county and not of the Federal Government?

Now, you shift that same individual over to a Federal program, relieving the county to that extent of its own expenditures, of its own money, hadn't you really substituted $1 for the other?

Mr. GROSSENBACHER. If what we are talking about is the basic subsistence payment and if we were moving JTPA dollars in to make the basic subsistence payments, with no county contribution to the overall Job Training Partnership Act program, that might be the case. But, as I understand it, the primary use of JTPA funds is to train people for employment to do the intake, the assessment, the referrals that are necessary to secure employment opportunities for these individuals. I do not believe that that is inconsistent with the intent of the act.

Again, whether, as some of the earlier witnesses indicated, it made good programmatic sense for the county to focus its training resources in this area is a question that is in need. It is up to the State, based on a review of the county's performance to determine whether they are meeting the performance standards. If the county does not meet the performance standards, then the State can step in and force the county to take, if the county does not on its own, appropriate corrective action that will result in the county meeting the performance standards.

Mr. HAWKINS. Mr. Hufford, in his report to the board of supervisors on January 6, 1984, among other things, said this:

> Initially we projected that implementation of the program would save the county $4 million, based in part on the fact that Job Training Partnership Act funds could be used for some of the participant stipends, well the county has been able to mitigate general fund expenditures by using JTPA money in the county employment and training program, the present number of participants substantially exceeds the budgeted number.

Now reading that, I would certainly assume that he is telling them this is the way the county can save $4 million by using Federal money. How can you read it otherwise?

Mr. GROSSENBACHER. I would not read the first two-thirds of that statement otherwise than the way you did. I believe that the last part of it indicates that the county has not, in fact, saved county money at the expense of JTPA, and that has been primarily due to the fact that the number of potential enrollees in the program has greatly exceeded the county's expectations.

Mr. HAWKINS. But he was saving up to the point, but he soon found out that you can't save money that way.

Mr. GROSSENBACHER. That is correct.

Mr. HAWKINS. But up to the $4 million he certainly had concluded, he thought the county was picking up $4 million. Then he has to admit that he's made an error.

Mr. GROSSENBACHER. It sounds that way.

Mr. HAWKINS. Mr. Martinez.

Mr. MARTINEZ. You know, just to amplify what the chairman is trying to point out to you, in Harry Hufford's statement, he attached attachments. On the last page of attachment B, page 4, it says—quite clearly giving the intent that it was to use JTPA money to substitute the moneys. He says in his statement here, and this evidently was adopted by the county board of supervisors, "While in the program, after * * *"

Briefly, in the beginning, it requires the recipient to become available for the job training program. It says:

"While the participant receives—while in the program the recipient will receive a stipend equal to what they received as a welfare subsidy."

Doesn't that indicate that he in his envisioned savings was using the stipend from the Job Training Partnership Act money to take care of that money they were paying that recipient under that stipend? To me it does.

Further, in Edelman's statement, he says that last August the board of supervisors established a policy to use JTPA money—dollars to offset the rising costs of general relief. Everything that I've heard here and other testimony and every statement that I read here indicates that, if I were sitting in your position, I would have no doubt about it. I would have no doubt whatsoever. The evidence to me here presented by the people themselves is overwhelming, that it was intended to do that. I don't know how you can sit there and still say that it wasn't or that it's not conclusive.

Mr. GROSSENBACHER. I'm sorry. I did not mean to speak to their intent. I was speaking to what I believe is the actuality, which I believe we heard here today. Because of the large number of unanticipated general assistance recipients, they have not, in fact, been able to surplant their county costs.

Mr. MARTINEZ. It's just simply because there was a cost overrun that they didn't anticipate, but the fact is that they were then allowed to continue on the attitude and the policy they've developed that they would then make the adjustments.

Let me give you a better example of that. When they do the allocations of the $12 million, in percentages they include the youth in there which, at least by their own testimony, 50 percent of those youth were never eligible for welfare. So then why would they be included in that figure to reduce the number—excuse me— backward. That at least 50 percent of those youth were eligible for welfare and yet they're not included in that welfare percentage. They're excluded because they're included only in a youth percentage, 44 percent. But by their statement—Harry Hufford's statement here, 50 percent of that youth—that they term "youth" were welfare recipients. So that, if you took the appropriate number, whatever the number was, and add that number—that 50 percent that they're talking about to it, it would increase that money—even increase that money being used to subsidize the welfare from JTPA money. So that it would mean that their intent—even their figures in what they run short are not accurate. They have not done an accurate job in reporting their figures. In effect, that shortage that they have may not be as great as they claim it is. Now they're claiming that shortage in order to justify that they are, in effect, not using that money to subsidize that program is what you just stated. I think they are. We won't know that unless we know the figures—what number of that youth were because they say 50 percent of it. So, if we knew the numbers, then we could properly take that money and allocate it to that general recipient.

Mr. GROSSENBACHER. We will be looking very closely at the first management information report from Los Angeles County which we have just received. They have been having some problems with the output side of their fiscal management information system. They have assured us that we will shortly get fiscal management reports. We are going to be looking very carefully at those reports to determine whether there are any inappropriate uses of JTPA funds, and to make sure that, at the bottom line, JTPA eligibles from all the required groups are being served and that the performance standards are, in fact, met. I think we have that same concern that the committee does in that regard.

Mr. Martinez. I would hope, when you look at the figures, you don't just take for word that every figure is where it should be and reflect what they want—what they're telling you it reflects.

Mr. Grossenbacher. Because of concerns about issues such as that, we have had members of our fiscal management staff recently on site with the Los Angeles staff working on their fiscal management reporting system so that we can get the information we need.

Mr. Hawkins. Mr. Dymally.

Mr. Dymally. Mr. Grossenbacher, I just have two quick questions.

One, are there any Hispanics or blacks on the training council?

Mr. Grossenbacher. On the State job training coordinating council?

Mr. Dymally. Yes.

Mr. Grossenbacher. Yes.

Mr. Dymally. Was the Department influenced in its decision about the county's program by the fact that the three board members are personal friends of the Governor?

Mr. Grossenbacher. I do not believe that to be the case. One of the key things that I think we have to keep in mind here is that there was an incredible time crunch when these plans came in and were being approved. We had as our major objective during that process getting JTPA up and running in California. The staff review on the plans was compressed. The council subcommittees that reviewed the plan worked several days at a crack on very tight time frames. Quite frankly, we did not have time to consider those kinds of political issues. It may be that we were saved from considering them by the time frames that we were under.

Mr. Dymally. One final observation.

Under Jerry Brown, small was beautiful. I think under this administration, new is not good. Under the old system, under CETA and SWETA, Compton had a job training program with the support of the private sector. Under this program, we don't even know who we should call. I mean we got wiped out completely. The Congress defunded CETA. The Governor vetoed SWETA. The private sector's response was, "If the government can't help you, we aren't in the job of totally funding groups," so they pulled out. Now with JTPA, we don't even know the phone number. So Compton, which is the most depressed city in the county, doesn't benefit from this program and that bothers me.

Ms. Pearson. May I answer that or partially answer that question?

Compton applied to be an independent SDA. They were not large enough to qualify. I recall at our subcommittee hearings we discussed with the Compton representative more than once their option of joining with Torrance, Carson, and Lomita in a consortium, and then the county proposed that Compton be part of the county instead, as they did with another independent SDA that wanted to be proposed. It was their choice to go with the county. We had actually suggested that they join up with the other three cities——

Mr. Dymally. Well, that was an incompatible marriage.

Ms. Pearson. Well, you know, there was the only other option.

Mr. Dymally. Economically they have gotten wiped out.

Ms. **Pearson**. Yes; it's a terrible problem.

Mr. **Dymally**. I listen to Mr. Shaw boasting about his plan in San Gabriel and I'm very happy for him, but that is a suburban population, and here the most depressed city in the county does not benefit from this program. That bothers me. Not only that, we have suffered a setback because the electronics industry has ceased to fund our program which was funded by CETA and CWETA.

Ms. **Pearson**. That bothers us too.

Mr. **Herman**. I thought you were bragging a few minutes ago of having so many members on the——

Mr. **Dymally**. No. I——

Mr. **Herman** [continuing]. Council from your area, and now you are talking about them.

Mr. **Dymally**. It took the steam out of me because I was about to attack them and then I see all my friends on this council.

Ms. **Pearson**. I might say that we do have blacks and Hispanics on the council. And, in fact, Ken Smith, whom I think you know, is quite outspoken, and so is Ernie Falger. I mean the people on there are not silent. We are a bunch of independent extroverts and the staff has trouble.

Mr. **Dymally**. The point I made earlier is that—it took the steam out of my question because I looked and I saw all of my friends there and yet we are suffering. I have to conclude that the system isn't working in our favor at all.

Mr. **Hawkins**. You'd better select better friends. [Laughter.]

Mr. Grossenbacher, I would like to ask you about the results that have been obtained in the first quarter, which we are quite interested in, regarding the characteristics and the placements that you mentioned on a statewide basis. We'd like to get some indication of who has benefited, as well as the demographics of those who have benefited and the type of jobs. But I won't get into that this morning. I think it would just prolong the hearing. We have other witnesses. But I would hope that this type of information could be furnished to the committee, to the staff of the committee. It certainly should be part of our record, if you will.

Mr. **Grossenbacher**. We will forward it to the staff.

Mr. **Hawkins**. Thank you.

May I thank the witnesses for their testimony in response to our requests.

Ms. **Pearson**. Thank you very much.

Mr. **Grossenbacher**. Thank you.

Mr. **Hawkins**. The committee will take a 3-minute break at this time. By that, we mean a very limited break, so don't think we are adjourned by any means.

[Recess.]

Mr. **Hawkins**. The committee is called back to order.

The next and final panel this afternoon is the service providers and recipients. Would these witnesses kindly be seated at the table: Ms. Carmen Estrada, Western Center on Law & Poverty; Mr. Howard Boyle, chair of the Los Angeles Regional Coalition of Service Providers; Mr. Byron Gross, staff attorney, Legal Aid Foundation of Los Angeles; Mr. Jack Grubbs, project director, Westside Center for Independent Living, computer training project.

We will take them in the order in which their names were called.

First is Carmen Estrada, Western Center on Law & Poverty.

Ms. Estrada, we look forward to your testimony, and we appreciate your contribution.

[Prepared statement of Karl Grossenbacher follows:]

PREPARED STATEMENT OF KARL GROSSENBACHER, CHIEF, JOB TRAINING PARTNERSHIP OFFICE, EMPLOYMENT DEVELOPMENT DEPARTMENT, STATE OF CALIFORNIA

Chairman Hawkins and members of the subcommittee, my name is Karl Grossenbacher, I am the Chief of the Job Training Partnership Office in the Employment Development Department which has been designated by the Governor as the agency to administer the Job Training Partnership Act.

I have been asked here today to provide testimony with respect to the procedures utilized by the state to assure compliance with the Job Training Partnership Act and to address the findings of the Director with respect to the complaint by the Western Center on Law and Poverty.

As background for my testimony I would like to emphasize that the Job Training Partnership Act has been operative for a period of only four months. The program in the State of California is off to a good start, and based on the data available is operating effectively even though we have experienced a few start-up problems that are typical in the start-up of programs of this scope.

The Job Training Partnership Act represents a change of focus for employment and training funded by the federal government. It represents a dramatic change from its predecessor CETA in that it measures the success of the program based on performance. Performance is measured by standards involving placement of trained individuals which are determined by the Department of Labor and may be adjusted by the state.

To specifically address the areas requested by the committee; the system established in California to assure compliance with the Act may be broken down into six major areas:

1. Plan review by EDD, the State Council and approved by the Governor.
2. Fiscal management system.
3. Management information system.
4. Field liaison staff.
5. Audit.
6. Director's independent investigation under state law.

The purpose of the fiscal management system is to monitor the adherence to generally accepted accounting procedures including day-to-day cash management by the service delivery areas.

The management information systems collects and collates fiscal and participant data submitted by SDA's and analyzed EDD staff quarterly.

The field liaison staff provide face-to-face contact between the service delivery areas and EDD. Currently, we have ten individuals in this capacity. In addition to review of reports submitted by SDA's, the field liaison staff conduct on-site visits to the SDAs each quarter. Their on-site visits are performed in accordance with a Monitoring Guide which EDD has developed. The guide gives instructions on how to conduct a review of SDA's administrative systems and program operations.

The audit system is composed of two components: (1) preawards surveys and (2) fiscal compliance audits. The preaward surveys have been completed on all 50 service delivery areas and the department is in the process of developing an audit plan and standards which will audit each service delivery area at least every 2 years. The state implementing legislation, the Family Economic Security Act, requires the Director of EDD to conduct an independent investigation whenever concerns about inappropriate program design or management are brought to his attention.

In the first three months of operation the 50 California Service Areas enrolled a total of 18,574 individuals. A total of 4,414 have been terminated, of which 3,123 or 70.8 percent have found jobs. While a substantial portion of this accomplishment is due to the carry-over of individuals who were enrolled in CETA, it nevertheless represents a substantial achievement by California's Private Industry Councils and Service Delivery Area Administrators who have been responsible for the operation of this new program.

The complaint filed by the Western Center on Law and Poverty came under the Director's independent investigation portion of this system. This complaint raised two issues with respect to the Los Angeles SDA; that the plan was improperly developed and approved at the SDA level and that the plan improperly "targets" general relief recipients. The Director concluded that there were no violations of the Act and so advised the complainant.

I understand that you wish me to address the specific approval process for the Los Angeles County SDA plan. EDD staff review identified the segments as required by JTPA. This brought to the attention of the Council Review Committee which identified four issues that had to be resolved before the plan could be approved:

The narrative had to be rewritten to reflect service to groups other than General Assistance recipients.

The Private Industry Council, Chief Elected Official Agreement had to be provided.

The Plan had to describe the process for selection of service providers.

The statistics in Table C III should be adjusted to reflect the new narrative.

The requested changes were made and the Los Angeles County Plan was approved.

JTPA is being implemented and administered in a manner consistent with the Congressional mandate for local level planning and administration. Within the limited authority afforded to the Governor by the Act, the state may not deny approval of plans that satisfy the basic requirements of the Act.

Under the Act the state may only disapprove a plan when:

(A) corrective measures for deficiencies found in audits or in meeting performance standards from previous years have not been taken or not acceptably underway;

(B) the entity proposed to administer the program does not have the capacity to administer the funds;

(C) there are inadequate safeguards for the protection of funds received;

(D) the plan (or modification) does not comply with a particular provision or provisions of this Act or of regulations of the Secretary under this act; or

(E) the plan (or modification) does not comply with the criteria under section 121(b) for coordinating activities under this Act with related program activities.

The Los Angeles Plan was approved because it did not violate any of the statutory bases for disapproval.

In closing I would like to emphasize that based on the data currently available from our management information system, the program is off to a very highly successful start.

I would be more than happy to answer any questions you may have.

STATEMENT OF CARMEN ESTRADA, WESTERN CENTER ON LAW & POVERTY, ATTORNEY

Ms. ESTRADA. Thank you, gentlemen. It's a pleasure to be here.

I'm Carmen Estrada with the Western Center on Law & Poverty. I'm an attorney there and one of cocounsel of the lawsuit against the county for what they have done and the attorney on two of the administrative complaints.

I think that we have to look at the JTPA plan and program here in Los Angeles County in two ways.

One is what they have proposed to do in their plan. Two is what we keep being told, and that is to wait until the end of the 9-month period and see what they do.

We feel clearly at the beginning and now that what they propose to do in their JTPA program plan has various prima facie violations of JTPA as well as the State JTPA coordinating law, FESA. We are very displeased to have not been able to have gotten any favorable results from the State administrative mechanisms.

I am going to summarize my testimony. I have two main points to make.

First, the question about the adequacy of the targeting standards, that is targeting what significant segments get served under any JTPA program.

Second of all, targeting enforcement, exactly who is going to come in and tell an SDA what to do when they clearly have not done what JTPA requires.

I recognize that the JTPA law is different from the CETA law. CETA required clearly equitable services to significant segments. JTPA does not require that. But it seems to require the same thing because, first of all, it requires equitable services to both AFDC recipients and youths on one hand, and, on the other hand, it requires nondiscrimination against certain protected groups.

We feel that those two requirements mandate what CETA mandated under its equitable service to significant segments of the population or target groups. From what we have seen from many of the service delivery areas in the State, they also feel the same way. Los Angeles County has broken rank. In their original proposed program the significant segments were not representative of who should be receiving the services in Los Angeles County. We're not here to debate whether or not GR recipients are eligible people under JTPA; that goes without saying. I think you have 558,000 people in Los Angeles County who are economically disadvantaged and are eligible, but you only have 4,000 slots. So when you're going to split the pie up, we feel that it should be on an equitable basis and not totally inequitable, such as what we have here in Los Angeles.

In exhibit A of my testimony, there is a chart which pretty much gives you the population characteristics breakdown. I won't go into all the elements here, but it talks about, in the first column, who is actually economically disadvantaged. The second column under client characteristics are the GR recipient characteristics. The fourth column is the original plan approved by the State and the PIC on September 30, 1983. The final column is what currently the program is targeting in terms of individuals who should be receiving services.

Despite the changes that the county has made in the program, in large part due to State intervention and even though we didn't agree with the findings, I think some changes did occur—in large part due to the lawsuits and administrative actions. We still have the program seeking to serve 72 percent men, 28 percent women, only 3 percent AFDC recipients, 29 percent black, 52 percent Hispanics, and no targets for limited-English-speaking people. Those are not good figures. We don't agree with them and we feel that they should be changed. We're very disappointed with the targeting enforcement provided to us by the State JTPA office and actually the lack of enforcement on that level.

We don't think that the State monitoring system is adequate. Granted that Los Angeles County has changed its focus from originally 100 percent GR to 90 to 75 percent, and now they're proposing to go as low as 50 percent; that does not solve the problem.

San Francisco County, in comparison, is serving 3 percent general assistance recipients. We believe Los Angeles County should serve an equal number, which is approximately 3 to 5 percent, and then should open up the slots to other eligible groups.

On February 7, last week, the Legal Aid Foundation of Los Angeles, Mexican-American Legal Defense Fund, and the Western Center on Law & Poverty filed on behalf of unemployment insurance recipients and AFDC recipients who could not get into the JTPA program here in Los Angeles County. We hope that on the Federal level we'll get better response to our complaints than we have been able to get on the State level.

One final point, which was raised in the administrative complaint that was filed on February 7 and which is illustrated in exhibit C of my testimony, is the fact that the county's plan seems to focus on AFDC-U recipients. They talked to you earlier about the program that happened last year where it was very successful with AFDC-U.

I must point out that AFDC-U recipients are generally two-parent families and those individuals who obtain training in two-parent families are generally the men. There is almost no mention of AFDC family group recipients which is generally women, single family heads of households, who really are overlooked and who appear to have been of primary consideration of not only JTPA but FESA, and are just not receiving adequate services under the Los Angeles County plan.

I'm looking at the PIC once again. The PIC may be adequately represented in some levels. Clearly 51 percent of the people are from the business sector as mandated by JTPA, but my reading of the PIC list show only two women out of about over 20 members, and I don't think that that is adequate. Of course, JTPA doesn't require, as CETA did, that there be once again equitable numbers of eligible groups on the PIC. But we feel that, in large part, we need to turn around the other PIC members in order to get more adequate services to women, AFDC recipients, from family group persons over the age of 45, and limited-English-speakers who are just not adequately served by the current county plan.

Thank you.

Mr. HAWKINS. Thank you, Ms. Estrada.

Without objection, your full testimony will be placed in the record, as it was submitted.

Next is Mr. Boyle, the chair of the Los Angeles Regional Coalition of Service Providers.

[Prepared statement of Carmen Estrada follows:]

PREPARED STATEMENT OF CARMEN A. ESTRADA, WESTERN CENTER ON LAW AND POVERTY, INC., LOS ANGELES, CALIF.

Congressman Hawkins and members of the subcommittee: My name is Carmen A. Estrada. I am an attorney with the Western Center on Law and Poverty in Los Angeles, California. On behalf of the Center and our clients we welcome the opportunity to present our comments on Los Angeles County's implementation of the Jobs Training Partnership Act [JTPA] for the 1983-84 program year.

Los Angeles County originally focused its total job training program on county welfare recipients. The county has since modified the numbers of county welfare recipients in its JTPA program but continues to serve a significant number of these individuals in its program.

By focusing the total program on this one economically disadvantaged population, the County is overlooking the job training needs of many thousands of other County residents: Recipients of Aid to Families with Dependent Children [AFDC], recipients of unemployment benefits, women, handicapped, persons over the age of 45, the limited-English-speaking and others not adequately included in the current County JTPA Program Plan.

The Los Angeles County Service Delivery Area [SDA] has over 558,320 persons who are economically disadvantaged for the purposes of JTPA job training. The County welfare population is only 3 to [illegible] percent of the County's economically disadvantaged. Despite this fact, the county has been allowed to primarily focus its job training program on this population by the State JTPA office. It is our belief that the JTPA program target population does not reflect the population characteristics of those who should be receiving the training services if it were distributed on an equitable basis.

For example, the original program participant plan targeted for training persons with the same characteristics of persons on the County welfare program: 72 percent men and 28 percent women, 49 percent Black, 21 percent Hispanic and 2 percent AFDC recipients. These numbers contrast sharply with the characteristics of the economically disadvantaged population which consist of: 55 percent women, 15 percent black, 52 percent Hispanic and 11 percent AFDC recipients.[1] The County revised their Participant's Program Plan in October 1983. The ethnic targets were changed to more accurately reflect the ethnic population (29 percent black and 52 percent Hispanic participants) but nothing was done to change the gender targets—the County plan still calls for training 72 percent men and 28 percent women. Adult AFDC recipients were increased from 2 percent to 3 percent of the targeted participants. The target for persons over the age of 55 was increased slightly. Finally, there is no target for persons with limited English proficiency. The lack of a target for this group seems shocking in a county where there are approximately 200,000 people with limited English skills. However, county planners apparently did not take this fact into consideration when developing the plan; rather, it more than likely considered that only 11 percent of the County welfare population had limited English speaking skills. Overall, these are but a few of the serious defects which we feel should be remedied in the current County plan.

On October 6, 1983, our organization made a request for an investigation to the Employment Development Department as provided for under the California Unemployment Insurance Code, section 15029. We raised numerous issues regarding the County plan which we felt did not comply with the State JTPA law. After several months of investigation the Director of the Employment Development Department released his declaration of findings which held that the issues we raised did not violate the provision of the State JTPA law. As a result, our concerns were never brought to the attention of the State Job Training Coordinating Council.

I am attaching a copy of all correspondence between our office and the State agency overseeing JTPA.[2] The Director of the Employment Development Department, in responding to our letter expressing displeasure with the declaration of findings, justified allowing the County of Los Angeles to continue on its course because he believed that the Governor has "limited enforcement authority." On the one hand, the Director of the State Department indicates that the SDA must meet general basic requirements in order to receive federal funds and that "recipients of payment of [AFDC] and eligible school dropouts be served on an equitable basis." On the other hand, he states the following: "The role of the Governor, as delineated by Congress, is to designate the Service Delivery Areas, certify the Private Industry Council, and approve the job training plan which is to be developed and prepared at the local level . . . The job training plan need only satisfy the general guidelines established by Congress."

He further underscores the limited powers of the Governor: "So long as a Service Delivery Area operates its program to deliver employment and training services within the described broad guidelines the Governor has *limited enforcement authority.*" (Emphasis added).

Despite the County of Los Angeles' blatant failure to serve women, AFDC recipients and other eligible population groups the State agency charged with overseeing local JTPA programs has failed to take any significant action on what, to us, is an obvious failure to meet the spirit and intent of the federal job training laws.

On February 7, 1984, our organization, joined by the Mexican American Legal Defense and Educational Fund and the Legal Aid Foundation of Los Angeles, filed an administrative complaint with the United States Department of Labor, Office of Civil Rights, alleging discrimination against women, AFDC recipients, and persons over the age of 45.[3] We hope for a favorable determination in that matter since it is clear to us that JTPA mandates equitable job training to AFDC recipients, women, and other categories. Unfortunately, the State JTPA agency did not share in our conclusions.

---

[1] See chart, exhibit A.
[2] Exhibit B.
[3] Exhibit C.

RECOMMENDATIONS

The goals and standards of JTPA are laudable in stating that various segments of the economically disadvantaged population are to be served on an equitable basis. Unfortunately, our experience in Los Angeles illustrates that the statutory standards enunciated in JTPA is insufficient. Los Angeles County has bypassed the obvious intention of Congress to serve the poor equitably, they have accomplished this by targeting County welfare recipients, a segment of the population that is not representative of the economically disadvantaged people in the County.

The Comprehensive Employment Training Act [CETA] was very specific in requiring that persons be served in proportion to their numbers in the poverty population. Specific language mandating equitable services to JTPA eligible populations would give guidance to SDA's targeting significant segments in their area.

Our experience in Los Angeles demonstrates the inadequacy of the State monitoring mechanism. Our Governor's "limited enforcement authority" has allowed the continuation of the Los Angeles County program as currently structured and may very well lead to additional counties following their lead. We do not believe that Congress intended that JTPA funds be used to save local counties money in the administration of their county welfare programs. When such an abuse occurs, it is important that an adequate complaint mechanism brings these matters to the attention of an enforcement authority that will take remedial action and not stand back and allow the program to continue despite obvious irregularities. Under CETA, the Department of Labor (DOL) had both the authority and experience to monitor programs. Delegating this authority to the State has resulted in a laisez-faire attitude which has allowed the largest SDA in the state to administer a program which wholly circumvents the intent of JTPA.

CONCLUSION

The goals of the JTPA program have great promise. The implementation of these goals in Los Angeles County has been a disaster. The County's program as structured excludes great numbers of women, AFDC recipients, non-English speaking persons and others which were served under CETA and are eligible populations under JTPA. The JTPA equitable service standards should not be so vague as to allow what has occurred in Los Angeles County to occur elsewhere. We urge the subcommittee's continued review of the Los Angeles County SDA. All that we ask is that JTPA equitably serve the various segments of the poor and give them the opportunities that Congress envisioned for work by which they can support themselves and their families.

Thank you.

(Exhibits A, B, and C appear in the appendix.)

STATEMENT OF HOWARD BOYLE, CHAIR, LOS ANGELES REGIONAL COALITION OF SERVICE PROVIDERS

Mr. BOYLE. I appreciate the opportunity to testify this afternoon on behalf of the Los Angeles Regional Coalition of Service Providers.

Our coalition is composed of community-based organizations and school districts engaged in job training as subcontractors with the county of Los Angeles. We provide training for eligible local residents and operate within the parameters of the county's annual plan and the implementing directives from the County department of community services.

Our coalition was formed 3 years ago by service providers. It is incorporated with by-laws, officers and standing committees. We are not sponsored by Government and do not receive any funds from Government at any level. Our association has grown to become the largest coalition in California of CBO's and school districts engaged in job training under the Job Training Partnership Act.

Because our coalition is relatively of recent origin, I want to mention a few of the organizations that belong to the coalition: The

Los Angeles Urban League; the Mexican-American Opportunity Foundation; the Chinatown Service Center; the Pacific-Asian Consortium in Employment; the Career Planning Center; the Los Angeles; United Community Housing and Development, formerly Catholic Archdiocese of Los Angeles; Cal State University, Los Anegeles; United Community Housing and Development, formerly known as Young Israel; the West San Gabriel Valley Consortium; the East San Gabriel Valley Consortium, and many, many others.

With that introduction, I would like to make some general observations regarding the current Los Angeles County plan of targeting general relief recipients in its JTPA program.

I want to make it very clear that we, as service providers, are not opposed to serving general relief recipients provided that they are served along with other eligible groups and that their presence will not force us to exclude other eligible persons from enrollment and participation. This sadly is not the case today.

No. 2, we believe that the current county general relief training program is in serious conflict with the intent of Congress in the JTPA legislation, which was to serve many segments of the poverty population and not just concentrate on one segment.

No. 3, the Job Training Partnership Act should not be used by local government officials as a convenient device to reduce their budgetary problems and by so doing so slamming the door in the faces of eligible poor people who should receive job training under JTPA.

The problems of implementing the current county general relief training program at the community level have been devastating and frustrating. I want to comment on some statements that were made this morning by earlier witnesses referring to the assessment process that takes place before general relief recipients are referred to subcontracting training sites. Let me state very clearly that there is no assessment of the general relief recipients.

As recently as 3 weeks ago, a service provider requested 40 general relief recipients from the county and requested that they be assessed as to their job skills. The county referred 29 general relief recipients to the agencies, none of whom had gone through an assessment process, and only 5 were found by the agency to have appropriate skills for their particular training program.

At no point before the current program was adopted were subcontractors consulted on any aspect of the program plan. We were simply told in a threatening manner that the board of supervisors had adopted the general relief training program and we had better conform with it or not be funded by the county.

The County department of community services began to negotiate with service providers, proposing a completely unrealistic participant cost of $1,488 which was supposed to include all costs, even general relief stipends. Since most general relief recipients receive $228 per month and these payments were to be charged to a subcontractor's participant costs, it was clear that no service provider could keep a general relief recipient in training for more than 8 to 12 weeks. As a result of contract negotiation, the range of most participant costs was finalized at between $1,488 and $2,600, including general relief stipends. These low participant costs, more than anything else, contributed to a design which dictated widespread program failure. Let me state that, contrary to what has been testified to today, it is the overwhelming opinion of our service providers that the current general relief job training program is not working. Experience would show that a training period of 6 months or more is necessary in order to make a welfare recipient self-sustaining in a competitive job market.

Many of the GR's assigned to service providers by the county were not ready for job training and no assessment took place. They weren't ready because of lack of skills, and, in addition to that, because they have serious health problems, including alcohol and drug addiction, and just plain hunger. Supportive services for GR's supposedly offered by the county have been sadly lacking or obscured by confusing and complicated administrative procedures. Service providers have had to become social workers and personal problem solvers for many GR's even before they can undertake training. Financial support for GR's in training has been grossly inadequate. How many people can pay rent, eat and be full-time students on $228 a month?

The current county general relief training program has been characterized by many incidents of administrative incompetence and poor management, and here are a few examples.

Example No. 1: Reference was made to this earlier this morning but I want to repeat it. A group of general relief recipients were assigned by the county to the Chinatown Service Center. This center has established an expertise in job training for Chinese residents and refugees who cannot speak English. None of the GR's assigned to the Chinatown Service Center by the county were Chinese or Oriental. Under county direction, the Chinese could not enter training at the center because there were no more openings, were sent to English language classes in the Los Angeles Unified School District, only to find that there were no instructors who could speak Chinese.

Example No. 2: A group of GR's residing in south central Los Angeles were assigned to a training site in Tarzana which was 30 miles away from where they lived. This particular agency has specialized in serving the training needs of women and the GR's sent to it were almost all single men.

Example No. 3: An agency located in Huntington Park, the center for employment training, was not funded by the county under JTPA. Despite this, since early October, groups of GR's have repeatedly been assigned to the agency by the county even though the director of the agency has called the county on numerous occasions to tell them that they are not being funded and could not accept the referrals.

Example No. 4: Some agencies located in east Los Angeles, a heavily Hispanic area, have been assigned groups of GR's who are not Hispanic. As a result, these agencies have been forced to turn away many Hispanic residents who are eligible for JTPA training because the general relief recipients have filled all of the available training slots.

Now in an effort to validate the experiences of service providers engaged in the current county JTPA program, our coalition is in the process of compiling the results of a questionnaire sent to all county-funded subcontractors. Our subcommittee has received 35 replies to date out of a possible 57 for a response of 62 percent. Earlier I gave members of your staff copies of the questionnaire.

While we are still analyzing the results, I want to share with you the number of responses received for each question contained in the survey, and the handwritten numerals on the pages of the questionnaire represent the number of replies received. I simply want to mention three of the questions and the responses.

Question No. 1, the JTPA program planning conducted by the Los Angeles County Department of Community Services for this current year, 1983-84, the largest single number of responses; very poor.

Two, the extent to which your agency participated this current year in planning the program. Again the largest group of replies in the category: Not at all.

When we talk about supportive services, supposedly provided by the county, the questionnaire indicates that—the question is asked: The availability and effectiveness of the county's support services to general relief participants in your program. The largest single group of replies were in the category of very poor.

So I want to share this questionnaire with you and, when our analysis has been completed, I plan to send a summary to your subcommittee.

I publicly want to thank the questionnaire subcommittee composed of Salvador Vasquez, Dan Pezold, Dorothy Eldan, Cathy Haggerty, Dan Robertson, and Glenn Farrell for their important volunteer work.

I would like to point out what we as service providers believe to be a potential critical problem facing us. We are operating under fixed price contracts. In other words, we have to get our final payments. We have to achieve a certain percentage of job placements.

From all of the reports that service providers have presented to me, the indications are very clear that many service providers will not be able to achieve those placement percentages enumerated in their contracts, and, therefore, would not be able to receive the full amount of their allocation. We feel this is a critical potential problem. We call it to your attention because, contrary to what has been stated here today, the general relief program is not a success, and, therefore, up to this point, our service providers are very, very much concerned about how they are going to be paid eventually under their contracts with the county.

In conclusion, I want to say that our coalition stands ready at any time to be of assistance to your subcommittee in helping to make the Job Training Partnership Act a success for all concerned.

Thank you.

Mr. HAWKINS. Thank you, Mr. Boyle.

Mr. Byron Gross, the Legal Aid Foundation.

[Prepared statement of Howard Boyle follows:]

PREPARED STATEMENT OF HOWARD A. BOYLE, CHAIRMAN, LOS ANGELES REGIONAL COALITION OF SERVICE PROVIDERS

I appreciate the opportunity to testify today in behalf of the Los Angeles Regional Coalition of Service Providers. In the way of identification of our group, let me say that our coalition is composed of community based organizations and school districts engaged in job training as subcontractors with the county of Los Angeles. We provide training for eligible local residents and operate within the parameters of the county's annual plan and the implementing directives from the county department of community services.

Our coalition was formed 3 years ago by service providers to be their organization. It is incorporated with by laws, officers, and standing committees. We are not sponsored by government and do not receive any funds from government at any level. Our association has grown to become the largest coalition in California of CBO's and school districts engaged in job training under the Job Training Partnership Act.

Our membership includes a wide variety of agencies and school districts. A few examples would be: The Los Angeles Urban League, the Mexican-American Opportunity Foundation, the Chinatown Service Center, the Pacific Asian Consortium In Employment, the Career Planning Center, the Los Angeles County Schools, the Los Angeles Unified School District, the Catholic Archdiocese of Los Angeles, the California State University, Los Angeles, United Community Housing and Development (formerly know as Young Israel), the West San Gabriel Valley Consortium, the East San Garbriel Valley Consortium and many, many others.

With the introduction, I would like to make some general observations regarding the current Los Angeles County plan of targeting general relief recipients in its JTPA program:

1. I want to make it very clear that we, as service providers, are not opposed to serving general relief provided that they are served along with other eligible groups, and that their presence will not force us to exclude other eligible persons from enrollment and participation. This, sadly, is not the case today.

2. We believe that the current county general relief training program is in serious conflict with the intent of Congress in the JTPA legislation which was to serve many segments of the proverty population and not just concentrate on one segment.

3. The Job Training Partnership Act should not be used by local government officials as a convenient device to reduce their budgetary problems and by doing so, slamming the door in the faces of eligible poor people who should receive job training under JTPA.

4. The problems of implementing the current county general relief training program at the community level have been devastating and frustrating. At no point before the current plan was adopted were subcontractors consulted on any aspect of the program plan. We were simply told in a threatening manner that the board of supervisors had adopted the general relief training program, and we had better conform with its or not be funded by the county.

5. The county department of community services began to negotiate with service providers proposing a completely unrealistic participant cost of $1,488 which was supposed to include all costs, including general relief stipends. Since most general relief recipients receive $228 per month, and these payments were to be charged to a subcontractor's participant cost, it was clear that no service provider could keep a general relief recipient in training for more than 8 to 12 weeks. As a result of contract negotiation, the range of most participant costs was finalized at between $1,488 and $2,600. These low participant costs, more than anything else, contributed to a design which dictated widespread program failure. Experience would show that a training period of 6 months or more is necessary in order to make a welfare recipient self sustaining in a competitive job market.

6. Many of the GR's assigned to service providers by the county were not ready for job training because they have serious health problems including alcohol and drug addiction and just plain hunger. Supportive service for GR's supposedly offered by the county have been sadly lacking or obscured by confusing and complicated administrative procedures. Service providers have had to become social workers and personal problem solvers for many GR's even before they can undertake training. Financial support for GR's in training had been grossly inadequate. How may people can pay rent, eat and be full time students on $228 a month?

7. The current county general relief training program has been characterized by many incidents of administrative incompetence and poor management. Here are a few examples:

Example No. 1.—A group of general relief recipients were assigned by the county to the Chinatown Service Center. This center has established an expertise in job training for Chinese residents and refugees who cannot speak English.

One of the GR's assigned to the Chinatown Service Center by the county were Chinese or oriental. Under county direction, the Chinese who could not enter training at the center because there were no more openings, were sent to English language classes in the Los Angeles Unified School District only to find that there were no instructors who could speak Chinese.

Example No. 2.—A group of GR's residing in South Central Los Angeles were assigned to a training site in Tarzana which was 30 miles away from where they lived.

This particular agency has specialized in serving the job training needs of women and the GR's sent to it were almost all single men.

Example No. 3.—An agency located in Huntington Park, the Center for Employment Training, was not funded by the county under JTPA. Despite this, since early October, groups of GR's have repeatedly been assigned to the agency by the county even though the director of the agency has called the county on numerous occasions to tell them that they are not being funded by the county and could not accept the referrals.

Example No. 4.—Some agencies located in East Los Angeles, a heavily Hispanic area, have been assigned groups of GR's who are not Hispanic. As a result, these agencies have been forced to turn away many Hispanic residents who are eligible for JTPA training because the GR's have filled all of the available training slots.

8. In an effort to validate the experiences of service providers engaged in the current county JTPA program, our coalition is in the process of compiling the results of a questionnaire sent to all county funded subcontractors. Our subcommittee has received 35 replies to date out a possible 57 for a response of 62 percent.

While we are still analyzing the results, I want to share with you the number of responses received for each question contained in the survey. The hand written numerals on the pages of the questionnaire represents the number of replies received.

When our analysis has been completed, I plan to send a summary to your subcommittee. I want to publicly thank the Questionnaire Subcommittee composed of Salvador Velasquez, Dan Pezold, Dorothy Eldan, Cathy Haggerty, Dan Robertson, and Glenn Farrell for their important volunteer work.

In conclusion, our coalition stands ready at any time to be of assistance to your subcommittee in helping to make the Job Training Partnership Act a success for all concerned.

STATEMENT OF BYRON GROSS, STAFF ATTORNEY, LEGAL AID FOUNDATION OF LOS ANGELES

Mr. GROSS. Thank you, Mr. Chairman.

I won't repeat my written remarks. I would just like to point out that I've included with my written testimony about 10 or 15 declarations from actual participants in the program showing some of the problems they've encountered. This includes disabled people who have been sent to take up valuable job training slots. It includes persons who became temporarily ill and were then terminated from the job training and terminated from their general relief stipend, even though they had presented medical excuses. It shows people who have not received any sort of assessment or evaluation of their training needs, and also many people who have had terrible experiences trying to get the stipends on which they depend to live because of all the snafus in the department administration of the program.

In addition to the declarations, I've also brought with me Mr. Nathaniel Smith who is a participant in the program. If I may, I would just like to make some very brief remarks and then cede some of my time to him because I think it would be valuable for you to hear from at least one person who has actually been through the job training, and has seen some very poor results and had some bad experiences.

On the question of whether Federal funds are being used to supplant county costs, I would just like to point out one more statement in Mr. Hufford's written testimony. I believe it's on page 4 of attachment A. He states, "Of the title IIA JTPA funds administered by the county, only 35.4 percent is being used for training and stipend costs for the general relief participants." So I think it's clear from his testimony that the Federal money is being used for stipend costs, and I think that's what everyone is very concerned about, that that was not the point of the Federal legislation; that the Federal money should be used for the stipend costs. The fact that the county has had to add additional money because there have been so many more persons than they expected does not take away from the fact that Federal money is being used for general relief stipends.

Also in Mr. Hufford's testimony he states:

> While in training, any former general relief recipient in the JTPA program will continue to receive a stipend equal to what they would have received on welfare. They also have available the same health care services, food stamp eligibility, transportation allowance, and other benefits.

I would like to point out that this was not the case at the beginning of the county's program. It's only as a result of our lawsuit and several trips to court that we have gotten the county finally in a position where they have been required by the court to provide these same benefits. In fact, the court has ordered that the county pay back approximately $1,300,000 in benefits which were legally entitled to the formerly general relief recipients and were denied to them. So not only is the county stopped at the intent of the Federal law, but they have also violated State law in the operation of the program. I think this belies their statement that their intent was only to provide good job training. I think it's clear their intent was to save money and all their actions have indicated that.

There is one manner in which the benefits being presented to the recipients are not the same. This is something we've been very concerned about from the beginning.

Under the general relief program, the $228 stipend is mailed to the recipient once a month, at the beginning of the month. The way it's been set up under the county's new program, the recipient gets his stipend in two installments of $114 each. Now everybody knows that people pay rent on a monthly basis, and how people are supposed to pay their rent at the beginning of the month on $114 is beyond me. We've seen lots of people who have been evicted because they could not receive a full stipend at one time and also because even that half stipend has not been forthcoming because of all the problems in check distribution.

People who are in job training cannot benefit from that training if, at the same time, they are dealing with trying to find a new place to live, trying to stave off eviction, trying to make endless calls to the department to try to find out where their check is. This is another manner in which the training has really been affected because, when people have these personal problems, they simply cannot benefit from the training.

Another item which has been discussed has been the coequal authority of the PIC in determining how the program is to be run. I'm very glad that the PIC has admitted that they were not on the train when the program took off. Now they seem to be putting a more critical eye on the county's program.

But there is one item in the set-up of this program that concerns me, and that's the fact that the PIC staff is the county staff. The PIC staff is the county department of community services staff, and that's where they get all their information from. I don't see how the PIC can be truly independent and truly effective if they are relying on the county itself for the information on which they make their decisions.

One more thing because I don't want to repeat anything. We are also concerned about the set-up that Mr. Boyle talked about with a performance-based contract so that the contractors only get paid if they place people. This puts an incredible burden on the contractors to place people after the inadequate training costs that they are given to train them. We have one client who was a young man who had been in the service and had electronics training. He had hoped that he would be able to get something similar under the program. Instead he reported that he and three other black men in his class spent 8 weeks sitting in the classroom cutting out magazine pictures, making collages, and getting psychological advice from a psychologist. After the 8 weeks of training, they were assigned to work in a carwash.

Now I know that JTPA training was not set up to teach people to work in a carwash because anyone could come off the street and get that kind of job. This man was so discouraged that he just dropped out of the program and just wasted the entire amount of training. We were very disappointed to hear that.

Now, if I may, I would like to give a few minutes to Mr. Smith who can tell you exactly what he personally has experienced.

Mr. HAWKINS. Could we get his full name, please.

[Prepared statement of Byron Gross follows:]

PREPARED STATEMENT OF BYRON GROSS, SENIOR ATTORNEY, LEGAL AID FOUNDATION OF LOS ANGELES

I am a Senior Attorney with the Legal Aid Foundation of Los Angeles. I worked for several years in our office in South Central Los Angeles, and for the last several years I have worked in our office on 8th Street near Downtown. The areas covered by both of these offices have a high concentration of General Relief recipients. Because so many former General Relief recipients have sought assistance from our offices regarding the problems which they are encountering as participants in Los Angeles County's JTPA program, we have by necessity become very involved in the monitoring of this program as it has developed during the last 4½ months.

What we have seen has been an appalling waste of millions of federal dollars. This debacle had its origin in the original planning by the Los Angeles County Board of Supervisors. Rather than focusing on the purpose of JTPA to create successful job training programs, the majority of the Board saw this as an opportunity to save money in its General Relief budget. Once the focus became saving County money rather than creating viable job training programs, the project was doomed.

One of the innovations of JTPA was the co-equal authority given to the private sector to fashion the job training plan on a local level. For this first phase of JTPA in Los Angeles County, this proved to be a farce. The local PIC did little more than rubber stamp the Board's plan to target General Relief recipients as almost the sole participants in JTPA adult job training slots. The PIC seemed unaware of the ramifications of the actions which it was taking. Moreover, in early PIC meetings, the public was barely allowed to express its views, being relegated to speak briefly and only at the end of the meetings. Fortunately, the PIC is now becoming a little more receptive to the public and seems to be regarding the County's program with a critical eye. However, the PIC's viewpoint is naturally biased because the county's Department of Community Services serves as the PIC's staff. Unless the PIC has its own staff, separate from the County bureaucracy, I do not believe that it will be able to act in a truly independent manner.

The Los Angeles County plan, which was pushed past the PIC in the summer of 1983 and implemented with very little advance planning, is a radical departure from the County's experience under the CETA program. Rather than being able to screen and choose their own participants, service providers were required, as a condition of their contracts, to accept mandatory referrals of General Relief recipients to fill up their programs. Simultaneously, all General Relief recipients who were classified as "employables", about 30% of Los Angeles County's General Relief program, were terminated from the General Relief program as of September 30, 1983 and transferred to the Department of Community Services. About 2,000 of these persons were assigned to JTPA slots, until there were no more slots available. The remainder of these persons, numbering another 10,000 or so, were either assigned to workfare projects with various County departments or only required to conduct independent job search. All participants continued to receive their maximum $228 monthly stipends from the County.

In some ways, this plan represents an outright mis-use of federal funds. Under JTPA, not more than 15% of the funds may be used for supportive services or needs-based payments. I am not contending that the County has exceeded this 15% limitation, but the County is undoubtedly using 15% of its JTPA funds to provide the stipends and other special needs payments which formerly were paid for with County funds. The monies funneled through JTPA were certainly not intended to replace local government expenditures for General Relief, but that is exactly how Los Angeles County is using a portion of its grant.

Moreover, another 15% of JTPA funds are restricted for use for administrative purposes. However, again, this was intended for administrative costs for administering job training programs. Los Angeles County, by having its Department of Community Services administer the JTPA program hand in hand with the General Relief program for employables, is, in effect, using these administrative funds for the costs of running its welfare program.

Aside from the possible mis-use of federal funds, the combination of the JTPA program together with the County's General Relief program has had an extremely negative effect on the quality and the success of the training being offered. This has been a result of extremely poor planning on the part of the Department of Community Services. The following are some of the problems which have arisen:

1. Lack of screening. There has been absolutely no screening of participants to determine the appropriate training program for them. Participants have merely been divided up among available slots more or less depending on where they live. At the beginning, this resulted, for example, in the Chinatown Service Center, which had a program for training Indo-Chinese refugees, being sent almost exclusively black men to be trained. We heard stories of a 60 year old woman being sent to training in the construction trades and of an illiterate man being sent for computer training. Obviously, if persons are not being screened to determine whether the

particular training program to which they are assigned can benefit them, then most of the money spent on the training is being wasted. Although some of the initial and more outrageous errors in assignment have perhaps been eliminated, there is still no effective screening to match participants with training programs.

2. Limited length of training programs. When Los Angeles County's plan was developed, the Board somehow thought that there would be JTPA slots available for a good portion of the General Relief-employable population. However, it soon became evident that the General Relief number far exceeded the number of available training slots. Therefore, the County required the service providers with whom it signed contracts to squeeze in several cycles of training in this first nine month period. As a result, some of the training programs were as short as eight weeks. This shortened training period is woefully inadequate for training the hardcore unemployed and especially difficult population which makes up the County's General Relief rolls. Many of these persons have never worked; many have received little formal education, and others are drug addicts or alcoholics. This is a population which badly needs training, but which needs extensive training, not that which can be provided in 8 to 12 weeks. Spending 12 weeks in a classroom learning basic math and English skills or working for 12 weeks in a wood shop is not enough to re-integrate this difficult population into the County's work force. The

County's greed in wishing to use federal dollars to support as many of these persons as possible has undercut the potential benefits of JTPA.

3. Poor administration of the program. In addition to the JTPA aspects of the County's plan, the entire new County program for General Relief-employables has been poorly administered. The Department of Community Services staff has absolutely no experience in managing a welfare program of this magnitude. The County perhaps anticipated that many persons would drop out rather than attend five days per week of job training. But this has not been the case, because these persons have nowhere else to turn for support, so rather than the General Relief ranks diminishing, the numbers have grown so that now there are approximately 15,000 persons in the program. The Department of Community Services jumped into this program without developing adequate systems to monitor eligibility, to terminate persons for failure to cooperate, to assign persons to county work sites or JTPA slots, or to distribute the twice-monthly stipend checks which replaced the former General Relief grants.

The result of this inadequate planning has been chaos of an unbelievable magnitude. The number of persons receiving incorrect amounts of checks or not receiving checks at all has been enormous. We have seen persons waiting in line up to six hours or more in order to receive a check, only to find that, at the end of the line, the check is not there. Hundreds of persons who were never assigned to participate in training or workfare have been terminated for not showing at their "assigned" place. Participants are told that they are being reinstated after attending pre-termination hearings, but then never receive checks again. Disabled persons have been terminated from the program, even when they presented medical excuses, without any provision for transition back to General Relief. (Of course, many of these unemployable, disabled persons should not have been assigned to take up JTPA slots in the first place, but were assigned because of the lack of screening.) Participants have been denied free health care at County health facilities, which they had been receiving under the General Relief program. Most frustrating, once a problem has developed, there seems to be no one at the Department of Community Services who is capable of rectifying it.

Although the majority of the persons in the Department of Community Services' program are not actually participating in JTPA training, these enormous problems which have developed have had an indirect effect on the JTPA program. The Department of Community Services staff has been so involved in trying to straighten out the mess which they have created for these 15,000 General Relief recipients, that they have been unable to properly administer the JTPA facet of the program.

In sum, the Los Angeles County experiment has been a disaster. It should not be permitted to spread to other counties around the country. Federal job training funds should not be used to replace county expenditures to support their indigent residents. The funds should be used solely for job training, for all eligible persons within the County, not just for the County's General Relief population. Los Angeles County should return its General Relief population to the welfare department, which is experienced in managing it, and let the Department of Community Services concentrate on re-building the JTPA program after its unfortunate first nine months.

Along with this testimony, I am submitting a set of declarations from General Relief recipients who have encountered serious problems since being transferred to the Department of Community Services' job training program. These include declarations from disabled persons who were assigned to JTPA slots, from persons who have become ill and then have been terminated from the program although they presented medical excuses, from persons who have been terminated for not appearing at their assignments but were never assigned to any job training or workfare site, and from persons who generally have had problems trying to get the meager checks on which depend.

DECLARATION OF GERALD ANAYA

I, GERALD ANAYA, declare as follows:

1. I am 28 years old. I have lived in Los Angeles all of my life. I presently live at 6716 Makee Avenue, Los Angeles, California 90001. I graduated from Bell High School and attended Los Angeles Trade Tech for four and half years studying to be a maintenance machinist. I also attended E. Los Angeles Junior College for three semesters in the law program.

2. I have been receiving General Relief since the summer of 1982. I have worked at four different worksites during this period. My most recent worksite was at the welfare office located at Spring Street and Grand Avenue. I was assigned to do maintenance work, although I was told I would be receiving job training last fall when the County was transferring us from the Department of Public Social Services to the Department of Community Services. I indicated in a questionnaire form that I filled out that I was interested in diesel mechanics and X-ray repair. The County has not told me whether I will receive any training at all, and I am beginning to believe that I will not get any real job training.

3. A letter from the Department of Community Services dated January 17, 1984 was sent to me stating that I would be terminated from the Specialized Career Rehabilitation Employment Program on January 24, 1984. A hearing was scheduled for me on that day so that I could present my side. The County claimed that I failed to attend my worksite for certain days in December. (See Exhibit "A", attached .)

4. At my hearing I told the hearing officer that the reason for my missing the work days in December was due to two deaths in my family. My mother passed away October 5, 1983 and my aunt passed away on October 3, 1983. I had the main responsibility for taking care of the family business surrounding these two deaths.

5. The hearing officer recommended that I be continued on the program. The DCS representative instructed me to bring in some proof of the deaths. Following the hearing, on the same day I brought in a document with the necessary proof.

6. I have been picking up my check on Spring Street at the Indochinese Service Center. On February 2, 1984 I received a card in the mail from DCS stating that I should pick up my February checks at the Jet Food Stamp Center located at 311 W. Manchester Blvd. on February 6. (See Exhibit "B", attached.)

7. On February 6 I showed up at 311 W Manchester Blvd. at approximately 10:45 a.m. I got in line and waited until about 5:15 p.m. When I got to the front of the line I was told that there was no check for me. The clerk gave me a slip of paper with the telephone numbers for the SCREP Hotline and told me to call these numbers. (See Exhibit "C", attached.)

8. I then contacted my attorney at the Legal Aid Foundation office. He told me that he had received similar complaints about clients not receiving their checks and that he would forward my complaint to the main office of DCS. He also told me that other people who had called the Hotline and got through were informed that their checks were at the assigned pick-up places.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 6th day of February, 1984.

Gerald Anaya

GERALD ANAYA

DEPARTMENT OF COMMUNITY SERVICES
(213) 974-7374

Jan. 17, 1984

SS# 550-98-9829
Dept. # Bldg. Serv-[illegible]
Employee # 501-501716

Dear GERALD ANAYA :

This letter is to inform you that you will be terminated from the Specialized Career Rehabilitation Employment Program (SCREP) on JAN. 24, 1984 . The reason for your termination is your non-attendance at your assigned worksite on the following days:

December 1983 5,6, 12, 13, 19, 20, 27

A hearing regarding your termination has been scheduled for JAN. 24, 1984 , [✓ a.m.]/p.m. at Florence Firestone 7807 S. Compton Ave. [illegible] . You are no longer required to report to any training or worksite between the time of this notification and your hearing.

You are entitled to be represented by a person of your choice at your own expense, and present witnesses on your behalf at your hearing. You may be able to obtain legal representation by contacting the Legal Aid Foundation of Los Angeles at (213) 487-3320.

Should the Hearing Officer uphold the original decision to terminate, you will not be eligible for General Relief or participation in a County employment and training program for sixty (60) days from the date of infraction that caused the termination.

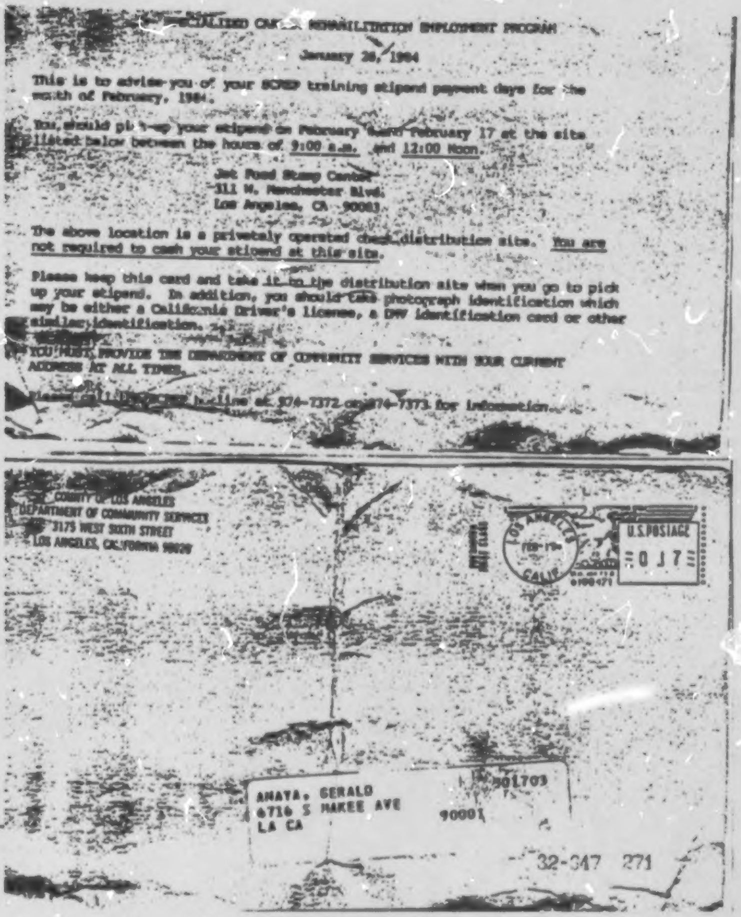
If you do not appear for the hearing, it will be assumed that you have agreed with the action taken, and you will not receive further notice regarding your termination.

Sincerely,

John Farley
JOHN FARLEY, Chief
Systems & Support Division

JF:EL:t

cc: MIS
Financial Management Division



SPECIALIZED CAREER REHABILITATION EMPLOYMENT PROGRAM

January 26, 1984

This is to advise you of your SCREP training stipend payment days for the month of February, 1984.

You should pick up your stipend on February [illegible] February 17 at the site listed below between the hours of 9:00 a.m. and 12:00 Noon.

Jet Food Stamp Center
311 W. Manchester Blvd.
Los Angeles, CA 90003

The above location is a privately operated check distribution site. You are not required to cash your stipend at this site.

Please keep this card and take it to the distribution site when you go to pick up your stipend. In addition, you should take photograph identification which may be either a California Driver's license, a DMV identification card or other similar identification.

YOU MUST PROVIDE THE DEPARTMENT OF COMMUNITY SERVICES WITH YOUR CURRENT ADDRESS AT ALL TIMES.

Please call the [illegible] hotline at 374-7372 or 374-7373 for information.

COUNTY OF LOS ANGELES
DEPARTMENT OF COMMUNITY SERVICES
3175 WEST SIXTH STREET
LOS ANGELES, CALIFORNIA 90020

LOS ANGELES CALIF FEB 1984

U.S. POSTAGE 0 17

ANAYA, GERALD 901703
6716 S MAKEE AVE 90001
LA CA

32-347 271

BEST COPY AVAILABLE

LOS ANGELES COUNTY
SPECIALIZED CAREER REHABILITATION EMPLOYMENT PROGRAM
February 6, 1984

Effective February 6, 1984, distribution of the training stipends for the Los Angeles County Specialized Career Rehabilitation Program is being changed to contracted check cashing/food stamp sites throughout the Los Angeles area.

If your stipend is not at this vendor site or if your stipend amount is incorrect, please do one of the following:

1. Telephone the SCREP Hotline at 974-7372, 974-7373 or 974-7374.
2. Go to either the Indo-Chinese Service Center, 524 N. Spring St., Los Angeles, CA. 90012 or the Florence-Firestone Service Center, 7807 S. Compton Ave., Los Angeles, CA. 90001 for assistance.

For further information about your stipend or the SCREP Program, please telephone the Hotline or go to one of the Service Centers listed above.

Remember that you must provide the Department of Community Services with your current address at all times. Address changes may be mailed or submitted in person to one of the Service Centers listed. FAILURE TO PROVIDE YOUR CORRECT ADDRESS WILL DELAY RECEIPT OF YOUR STIPEND AND MAY RESULT IN YOUR BEING TERMINATED FROM THE PROGRAM.

BEST COPY AVAILABLE

DECLARATION OF ARTHUR BARRAGAN

I, ARTHUR BARRAGAN, declare:

1. I am 40 years old and a resident of Los Angeles County.

2. I began receiving General Relief (GR) benefits in December, 1982.

3. In September, 1983, I was referred to the new county job training program.

4. On November 3, 1983, I went to the Mexican American Opportunity Foundation (MAOF) where I was to receive job training. I picked up my check from Mr. Madrid and was told to return for training on November 7, 1983.

5. On November 7, 1983, I was in great pain in the area where I had prior hernia surgery. I called MAOF and spoke to Mr. Madrid. He told me to get medical treatment and to bring a doctor's excuse and there should be no problem. He did not say anything about any particular time to bring in the excuse.

6. On November 7, 1983, I called two county clinics to seek medical treatment, Roybal Clinic and El Monte Clinic. Both clinics told me I could not get an appointment for a month.

7. I was able to get an appointment at the County USC Medical Center for November 15, 1983. After I went to my appointment, I took a note from the doctor to Mr. Madrid on the 15th. He accepted the doctor's statement. He did not tell me that I had missed any deadline to bring in the statement. I told him they had given me another appointment for November 17, 1983. Attached as Exhibit "A" is a copy of the doctor's statement.

/ / /

8. On November 17, 1983, I went to my appointment and was scheduled for surgery on December 7, 1983. Attached as Exhibit "B" is a copy of the report of my appointment on the 17th. Attached as Exhibit "C" is a copy of the surgery appointment.

9. On November 17, 1983, I took these two documents to MAOF to show to Mr. Madrid. He told me he didn't know anything about the statements and I had to talk to Mr. Moreno, the director.

10. Mr. Moreno told me he could not find the check and that I was terminated because I did not bring in the doctor's statement by the 10th. He told me he could not find my check and I should go to the county office located at 133 N. Sunol to get my check.

11. I went to the county office on Sunol to pick up my check. They could not find my check and I was told by a clerk that I would not get a check because I had been terminated for not bringing in a doctor's statement by the 10th. They did not tell me what I should do or who I should talk to about my termination.

12. I have never received written notice of termination or a written copy of any grievance procedure. I want the opportunity to explain why I was not at the training.

13. I have no income except the county benefits, and if I do not receive the benefits I will be evicted and have no money for the necessities of life.

14. I went to Legal Aid and they are trying to help me get my check or find out what my rights are.

/ / /

15. I do not know whether I should still go to the job training or whether I will receive my check.

16. I will not be able to work until after my surgery on December 7, 1983 and until I have recovered from surgery.

17. The facts stated in this declaration are personally known to me and I have first hand knowledge of them. If I am called as a witness, I could and would competently testify thereto under oath.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 28, 1983 at Los Angeles, California.

Arthur Barragan

ARTHUR BARRAGAN

DECLARATION OF VIRGINIA COOK

I, VIRGINIA COOK, declare:

1. I am 47 years old and a resident of Culver City, California.

2. Prior to October 1, 1983, I received General Relief benefits from the County of Los Angeles.

3. On or about September 14, 1983, I received a notice that I was being terminated from General Relief and transferred to a new County job training program. ~~Attached as Exhibit "A" is a copy of the notice.~~

4. I was told I would receive a check for $114.00 every two weeks for ~~Pending~~ pending job training. I have received one check for $114.00, but my second check was only for $80.50. My training supervisor has called different people from the County, but no one has been able to help me, and I will not be able to ~~[illegible]~~ buy other necessities. I need special medical equipment to test my blood sugar I cannot afford to buy it with the amount of check I receive.

5. I was told I would receive $20.00 per month while I am in training, but I have not received any transportation allowance.

6. I was told I could not get any clothing allowance, and I need clothing to attend the job training to which I am assigned.

7. I have diabetes and am being tested for the possibility I have cervical cancer. I believe I am to disabled to be employable at this time. I must have a special diet and I cannot afford it with the amount of check I receive.

/ / /

/ / /

/ / /

8. No one from the County asked me about my education or previous job experience before they referred me to the training program I attend.

9. The facts stated in this declaration are personally known to me and I have first hand knowledge of them. If I am called as a witness, I could and would competently testify thereto under oath.

I declare under penalty of perjury that the foregoing is true an correct.

Executed on this 11/7/83 day of November, 1983 at Los Angeles, California.

Virginia Cook
VIRGINIA COOK

DECLARATION OF WILLIAM COOK

I, WILLIAM COOK, declare:

1. I am 46 years old and a resident of Culver City, California.

2. Prior to October 1, 1983, I received General Relief benefits from the County of Los Angeles.

3. On or about September 14, 1983, I received a notice that I was being terminated from General Relief and transferred to a new County job training program. ~~Attached as Exhibit "[illegible]" is a copy of the notice I received.~~

4. I was told I would recive a check for $114.00 every two weeks for attending job training. I have received one check for $114.00, but my second check was only for $80.50. My training supervisor has called different people from the County, but no one has been able to help me, and I will not be able to pay my rent.

5. I was told I would receive $20.00 per month for transportation while I am in training, but I have not received any transportation allowance.

6. I was told I could not get any clothing allowance, and I need clothing to attend the job training which I am assigned.

7. I have diabetes, high blood pressure, and thyroid disease. I may have to have surgery for my thyroid problem. I believe I am too disabled to be employable at this time.

/ / /

/ / /

/ / /

8. No one from the County asked me about my education or previous job experience before they referred me to the training program I attend.

9. The facts stated in this declaration are personally known to me and I have first hand knowledge of them. If I am called as a witness, I could and would competently testify thereto under oath.

I declare under penalty of perjury that the foregoing is true an correct.

Executed on this ______ day of November, 1983 at Los Angeles, California.

WILLIAM COOK

DECLARATION OF WILLIE DAVIS

I, WILLIE DAVIS, declare as follows:

1. My name is Willie Davis. I reside at 880 South Main Street, Los Angeles, California 90003. I am a resident of Los Angeles County and have been unemployed since 1982. I last worked as a clerk for the United States Postal Service.

2. I made an application for the General Relief program through Los Angeles County on May 2, 1983. I was a general relief recipient from May 2, 1983 through September 30, 1983. On or about the last week of September I received a notice that I was being transferred to a job training program the Specialised Career Rehabilitation Employment Program (SCREP) which would begin on October 1, 1983.

3. On October 11, 1983 I received an orientation about the job training program which I was transferred to. I was informed that I would be worked in the building services section of Martin Luther King, Jr. Hospital as a custodian. I was suppose to work two days a week, Monday and Tuesday from 7:00 a.m. to 3:30 p.m. My supervisor was a Mr. Cole, and the person I reported to every morning was a Ms. Wilma Smith. I signed in each day I worked in a book.

4. I informed Mrs. Brown after the orientation that I was a para-professional in mental health and had received an Association of Arts degree (AA) in Human Services from Los Angeles City College along with a Human Services Certificate. In fact I had worked as a facilitator-counsellor at the Ann Sippi Clinic in El Serreno for three months in 1982 before I went to work at the Post Office. I asked Mrs. Brown to transfer me to a mental health

unit at Martin Luther King Hospital.

5. During the orientation on October 11, 1983 all the transferrees were informed that the only date we were not to go to work were the days that we received our stipend check; this was told to us verbally. I received a little white card in the mail that said that I could only have four or five unexcused absences before I was terminated from the SCREP program.

6. On December 5, 1983 I reported to 7807 South Compton Boulevard in order to pick up my stipend check in the amount of $100.00.

7. I did not receive my stipend on that day and was told by one of the workers at the office there that I should come back on December 6 to pick up my check because the checks had not arrived from downtown. I went back on December 6 and was told that I had to report on December 7 because my stipend check was still not there. On December 7th I called Ms. Smith and told her I had not come in on the 5th and 6th of December as I had not received my stipend check. Ms. Smith said that she was glad that I had called her. I did not receive my stipend at all during the week of December 5, 1983.

8. On December 9, 1983 I received a notice from the County of Los Angeles Department of Community Services. (Attached here as Exhibit A) that I was being terminated from SCREP. That notice said "The reason for your termination is your non-attendance at your assigned worksite". (Exhibit A) I did not understand the notice as I have always gone to my worksite. I had an excuse from my doctor (See Exhibit B) when I had to go to the Veteran Administration Hospital for an appointment on November 15, 1983.

///

9. I called Ms. Smith at Martin Luther King, Jr. Hospital to see why I was being terminated. Ms. Smith did not know why I received the notice of termination.

10. I called the Legal Aid number 487-3320 listed on the notice of termination. That office referred me to the South Central Legal Aid Office which is located at 8601 South Broadway.

11. On the morning of December 12, I called Mr. Triggs at the Department of Community Services (DCS) to find out what time my hearing was as the notice had the time circled as p.m. Mr. Triggs told me to come in any time after 1:30 p.m. for my hearing.

12. On the afternoon of December 12, 1983 I was called by someone in DCS to come pick up my stipend. I went into the DCS office and received a stipend check that afternoon.

13. I do not understand why I am being terminated and I have not been able to get any information from DCS about my case.

14. I have not received any job training nor have I received any word about my request to be transferred to the mental health unit.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 13th day of December 1983, at Los Angeles, California.

Willie J. Davis
WILLIE DAVIS
Declarant

DECLARATION OF JIMMY DUKES

I, JIMMY DUKES, declare as follows:

I am a resident of the County of Los Angeles and my address is 1947 Leighton Avenue, Los Angeles, California 90062. I have lived there approximately two years.

On October 4, 1983, shortly after exhausting my Unemployment Insurance Benefits, I applied for General Relief benefits at the Department of Public Social Services office, located at 2207 S. Grand Avenue.

After completing the eligibility forms and the work evaluation in October, I was assigned by my social worker, Ms. G. Price, to the Specialized Career Rehabilitation Employment Program and to a training site called Project Heavy, an employment training center located at 1032 Martin Luther King Jr. Blvd. I have at all times fully cooperated with the requirements of the Project Heavy training program.

The first benefits check I received in the mail was in the first week of November. I noticed that it incorrectly stated my first name as "David". Because I could not cash this check as issued, I contacted the Department of Community Services office at 3175 W. 6th street. There I was told to go to the Bank of America located at 3191 Wilshire Blvd. to get the check cashed. When this proved to be unsuccessful I returned to the office and the worker I had spoken to there saw to it that the check was re-issued with my correct name. Through this office I submitted several written requests to have my name changed. However, I received my second check in the middle of November and the name was again incorrect. I returned to the DCS office and a new check was issued in my correct name following the same procedure as before.

After receiving the first two checks, I then received a notice from DCS dated December 30, 1983 indicating that I was being terminated from SCREP and General Relief for allegedly failing to participate in the employment training program because I had not picked up my stipends (See attachment, Exhibit "A"). The notice further said that a hearing was scheduled on December 27, 1983 at 524 N. Spring Street for the purpose of allowing me to contest the decision.

At the hearing the DCS representative stated that I was being terminated for failing to pick up my stipends for November 17/18 and December 5/6. In response I stated that I presumed the problem stemmed from the use of the incorrect first name on my first two checks, both of which I received in the mail in November. I further stated that I was able to cash both checks by having them re-issued at the DCS office. I also submitted a letter from Project Heavy which indicated I had participated fully in their training program. The hearing officer indicated that DCS would have to investigate the matter and notify me of their decision by mail.

By letter dated December 29, 1983 I was notified that I would be continued in the SCREP program (See attachment, Exhibit "B"). Also included in the letter was a summary of the hearing (See attachment, Exhibit "C"). I noted several discrepancies in this summary. One was that it did not show that I had submitted the letter from Project Heavy. Another was that DCS had submitted a printout (computer?) with the dates of the missed checks.

I do not recall the DCS representative ever submitting any documents at the hearing. Despite the favorable decision, I have still not received my second December check as of this date and I am told to expect further delays before I do receive it.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2nd day of January, 1984, at Los Angeles, California.

Jimmy Dukes

JIMMY DUKES

COUNTY OF LOS ANGELES
DEPARTMENT OF COMMUNITY SERVICES

[illegible] West Sixth Street / Los Angeles, California [illegible]
(213) 974-7376

12/30/83

SS.# 569-90-0[illegible]

Dept. # 804 Emp.# 912076

Dear Jimmy Dukes:

This letter is to inform you that you will be terminated from the Specialized Career Rehabilitation Employment Program (SCREP) for nonparticipation effective the date of your scheduled appeal hearing as shown below. You are being terminated for nonparticipation as evidenced by the fact that your stipends for the periods listed below were not received nor do our records show you have made any effort to obtain these stipends.

☐ October 3 or 4, 1983
☐ November 3 or 4, 1983
☒ December 5 or 6, 1983
☐ October 17 or 18, 1983
☒ November 17 or 18, 1983
☐ December 19 or 20, 1983

A hearing regarding your termination has been scheduled for:

Dec. 27, 1983 at ☐ A. M. ☒ P.M.

524 N. Spring Street, Los Angeles, California 90012.

You are no longer required to report to any training or worksite between the time of this notification and your hearing.

You are entitled to be represented by a person of your choice at your own expense, and present witnesses on your behalf at your hearing. You may be able to obtain legal representation by contacting the Legal Aid Foundation of Los Angeles at (213) 487-3320.

Should the Hearing Officer uphold the original decision to terminate, you will not be eligible for General Relief or participation in a County employment and training program for sixty (60) days from the date of infraction that caused the termination.

If you do not appear for the hearing, it will be assumed that you have agreed with the action taken, and you will not receive further notice regarding your termination.

Sincerely,

John L. Farley

JOHN L. FARLEY, Chief
Systems and Support Division

EXHIBIT "A"

COUNTY OF LOS ANGELES
DEPARTMENT OF COMMUNITY SERVICES
3175 West Sixth Street / Los Angeles, California [illegible]
974-7373

December 29, 1983

Dear Participant:

The following action has been taken as a result of the hearing on your involvement in the Specialized Career Rehabilitation Employment Program (SCREP), held December 27, 1983, which you failed to attend.

☐ You have been terminated from the program effective December 27, 1983.

As explained in the hearing notice sent to you prior to the hearing, the decision to terminate you from the program means you will not be eligible for General Relief or participation in a County employment and training program for sixty (60) days.

☒ You are being continued in the program. You will hear from us further in the immediate future. Attached is your copy of the Hearing Officer Decision.

Very truly yours,

John L Farley

JOHN L. FARLEY, Chief
Systems & Support Division

JLF/dn
Attachment

cc: Fiscal

EXHIBIT "B"

568-90-0170

HEARING OFFICER DECISION

1947 Leighton Av
LA 90062

NAME OF PARTICIPANT: Mr Jimmy Dukes

NAME OF HEARING OFFICER: MR. RAY DEL RIO

DATE OF HEARING: DEC. 27, 1983

PERSONS PRESENT AT HEARING AND THEIR FUNCTION/AFFILIATIONS:

Participant

Dept. Advocate: Donna Pierson

BASIS FOR INITIAL AGENCY DECISION/PARTICIPANT COMPLAINT:
Failure To pick up Nov. 11-18 - Dec. 5-6. Participant states he did show up for pick-up, but check were under "David Dukes" Participant states he inform them of supplement was made out to him, with correct name.

DOCUMENTARY EVIDENCE SUBMITTED AT HEARING:

None - Participant

Department showed Printout with dates where client did not pick-up.

SUMMARY OF TESTIMONY AT HEARING:
Since Participant states that checks were made out under the name of David Dukes & was informed that they would be void. "Master calendar should be checked". Participant did rec'd or pick-up his supplement under Correct name.

HEARING OFFICER'S DECISION AND BASIS FOR DECISION:
participant instructed informed 6th St. DCS. Staff to make speed letter for name Correction. Participant should on the Program, & Continue to pick-up his checks, Also To Report To his worksite on his schedule date.

IF APPROPRIATE, EFFECTIVE DATE OF ACTION TO BE TAKEN AS A R[illegible] OF DECISION [redacted]

DECLARATION GARY LEE MILLER

I, GARY LEE MILLER, declare as follows:

1. I live at 8000 S. Hoover Street, Apt. #11. I am 23 years old. I have been receiving General Relief since May of 1983. I was never on General Relief before that time.

2. I have lived in Los Angeles since 1973. I graduated from John C. Fremont High School in 1978. I have had jobs working in a fast-food restaurant as a cook, a janitorial service company as a maintenance person, and a print shop as a offset printer. My longest period of employment was approximately one year.

3. I was part of the transfer from the Department of Public Social Services to the Department of Community Services in September, 1983. I would like to receive employment training in machine operation or welding.

4. I have been assigned to two worksites since being on General Relief. My first assignment was at Martin Luther King Jr. Hospital from May until September, 1983 doing maintenance work. I was then assigned to a County building located at Gage and Holmes doing maintenance work.

5. I was scheduled to work Wednesday and Thursday from 5:00 p.m. to 11:00 p.m. at the County building. I never missed a day of my work assignment since being transferred.

6. I received a letter dated January 17, 1984 from the Department of Community Services stating that I would be terminated from the Specialized Career Rehabilitation Employment Program for allegedly not attending my worksite for seven days in December. (See Exhibit "A", attached.)

7. At my hearing I told the hearing officer that I had not missed any days of my work assignment and that I believed the problem was caused by the change of my worksite supervisor in early December. He was no longer at the worksite in the evenings and there was no one to take his place. Since the building was not open in the evenings after his transfer, I was told to call to the Department of Community Services and to ask whether I would continue working for my old supervisor or receive a new work assignment. When I called, I was told that I would receive a letter in the mail informing me of my next work assignment. I never received that letter, but I was still notified that I would be terminated. There was no one from the worksite at the hearing to testify against me.

8. The hearing officer recommended that I be continued in the program. I was told that I would receive a letter within three to five days and that the letter would tell me when to go back to my worksite. She also told me that I would be receiving my next check on schedule.

9. I never received the letter following the hearing. However I did receive a post-card in the mail from the Department of Community Services which stated that I should pick up my February checks at Thomas Nix Distributor, located at 11121 Crenshaw Blvd. When I went to that location on February 6 they did not have my check. I was told that they had not received it and they gave me a telephone number to a hotline. I had waited in line for over three hours to be told this.

10. After leaving the line I telephoned the hotline number and I spoke to a woman. When I asked her for her name

she hung up on me. When I tried again the line was busy. Next I called another number for the Department of Community Services. I was told by this person that perhaps my check had been sent out late but that it would be at the Crenshaw location. I went back to the distribution center at approximately 5:00 p.m. and when they looked on a list of names I was told that I had been terminated.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 7th day of February, 1984 at Los Angeles, California.

Gary Lee Miller
GARY LEE MILLER

COUNTY OF LOS ANGELES
DEPARTMENT OF COMMUNITY SERVICES
(213) 974-7374

JAN 17 1984

SS# 571-19-0253
Dept. # Bldg Serv - Florence Ave
Employee # 601-601105

Dear Gary Miller:

This letter is to inform you that you will be terminated from the Specialized Career Rehabilitation Employment Program (SCREP) on Jan. 24, 1984. The reason for your termination is your non-attendance at your assigned worksite on the following days:

December 1983: 8, 14, 15, 21, 22, 28, 29

A hearing regarding your termination has been scheduled for Jan. 24, 1984 [✓ a.m.]/p.m. at Florence Firestone 12807 S. Compton [illegible]. You are no longer required to report to any training or worksite between the time of this notification and your hearing.

You are entitled to be represented by a person of your choice at your own expense, and present witnesses on your behalf at your hearing. You may be able to obtain legal representation by contacting the Legal Aid Foundation of Los Angeles at (213) 487-3320.

Should the Hearing Officer uphold the original decision to terminate, you will not be eligible for General Relief or participation in a County employment and training program for sixty (60) days from the date of infraction that caused the termination.

If you do not appear for the hearing, it will be assumed that you have agreed with the action taken, and you will not receive further notice regarding your termination.

Sincerely,

John Farley
JOHN FARLEY, Chief
Systems & Support Division

JF:EM:t

8 6 0 Return 1-25-84
9:30 A.M.
Malvison
571-1524

DECLARATION OF LEMIAL NELMS

I, LEMIAL NELMS, declare as follows:

I know these facts of my own personal knowledge and if called as a witness I would and could competently testify thereto.

I am a general relief recipient, who has been assigned to the JTPA program operated by the Department of Community Services. Until the other day, I was living at 311 Winston Street, Los Angeles in a hotel.

I had a lot of problems with my checks in October. I did not receive my full checks and after much difficulity with the Department, I finally got them to issue the correct checks. By the end of October, I did receive a total of $238, which included $228 for my grant plus $10 for the transportation allowance for October.

At the beginning of November, I should have received $124, but my check was only in the amount of $29. After much hassling with the Department, I got a supplemental check issued and got the correct amount.

Then, in the middle of November, I again received a check for $29, instead of $124. I went to the Sixth Street Office of the Department of Community Services. They told me I had to go to Patriotic Hall to straighten it out.

At Patriotic Hall I was told that they would not take care of my problem, because they had too many people lying about their checks. I did fill out a form, but I was told that I would not receive any additional money. Then when I complained about not receiving my full checks, I was arrested, but almost immediately released.

Because I do not have sufficient money to pay my rent, I was locked out of my hotel room on November 18, 1983.

On November 21, 1983, I was still homeless and I went to the Inner City Law Center for assistance. Margaret Holub gave me assistance and she reached Mr. Robert Tunks at DCS on the telephone. Mr. Tunks could give no explanation about why I received the wrong check, but he did arrange for me to receive a housing voucher and said that I would receive the remainder of my check on November 22, 1983.

I am afraid that the same thing will happen again next month, because every check which I have received from DCS has been in the incorrect amount.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Los Angeles, California on November 22, 1983.

LEMIAL NELMS

DECLARATION OF JOAN NEWTON

I, JOAN NEWTON, declare:

1. Prior to October 1, 1983, I received General Relief benefits from the County of Los Angeles.

2. On or about September 12, 1983, I received a notice I was being terminated from General Relief and transferred to the new county job training program. Attached as Exhibit "A" is a copy of the notice I received.

3. I was told that I would receive two checks per month in the amount of $114 each. I have received one check for $114, but the second check I received was only for $75.25.

4. I have tried to find out why I did not receive the full amount of check I was told I would receive, but after calling many telephone numbers I was given, no one has been able to tell me what happened or when I will get the amount I was promised.

5. As a result of not receiving the full amount I was promised, I am not able to pay my rent and will be evicted.

6. I have never received the $20 per month transportation allowance I was promised.

7. While I was receiving General Relief, I had to go to the County Hospital to work 7 days a month from 6 a.m. to 2 p.m. at the laundry.

8. Since I have been in the new job training program, I was told to keep going to the same job, at the laundry in the County Hospital. I am not receiving training of any kind, and I am simply continuing to do work for the County.

9. When I tried to find out about training, I was told by several people in the County offices that they did not know anything about any training.

10. I have tried to get a clothing allowance that I was getting under

the G.R. program, but no one could tell me how to get the clothing allowance.

11. No one in the County has asked me about my education or previous job experience, or attempted to place me in any training I would liek to receive training so that I can find a good job.

12. The facts stated in this declaration are personally known to me and I have first hand knowledge of them. If I am called as a witness, I could and would competently testify thereto under oath.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this _____day of November, 1983, at Los Angeles, California.

JOAN NEWTON

DECLARATION OF RAMONA QUIROZ

I, RAMONA QUIROZ, declare the following:

I am a 51 year old woman with a history of asthma, arthritis and a sensitive left eye. My medical condition is not considered severe enough to be disabling.

I have been on General Relief since January 1983 due to having difficulty finding a job. My past work experience is doing domestic work.

Prior to this new JTPA program, I was assigned to do maintenance work at USC Hospital.

I was given an appointment to go to DCS on October 3, 1983. At DCS I was given a referral to be in front of DPSS/Civic Center at 7:00 A.M. the following morning. This referral turned out to be for a Department of Beaches bus pick up.

My assignment at the beach was to pick up trash and seaweed with a rake.

We arrived there at 8:30 A.M. and worked until 2:00 P.M. under the hot sun. My assignment was a far distance from the nearest restroom and drinking water facility.

I became very ill after four days of this beach clean up work. I developed a kidney infection and my abdomen swelled up due to lack of drinking water and the far distance of the restrooms. I began to experience dizziness and back and abdomen aches and pains. The rays of the hot sun (no shade available) affected my eyesight and my sensitive left eye began to tremble and hurt me.

I finally went to the doctor and he wrote a note stating that I couldn't work under the sun. I submitted this note to my employment worker and he sent me home. I have not heard anything further regarding another work assignment.

I am confused about this new JTPA program. I had been told that it would be to supply us with meaningful training. When I went to the meeting at DCS on October 3, 1983, we were not informed as to what kind of training was available or when it will take place. To me going to the beach to clean up garbage is not meaningful training.

I think that there should be someone available to screen persons properly before we are sent to job and/or training sites.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on November 3, 1983, at Los Angeles, California.

Lo escrito arriba ha sido traducido, y yo entiendo y declaro lo mismo.

Ramona Quiroz
RAMONA QUIROZ

I have accurately translated the above declaration for RAMONA QUIROZ. She stated that she understands and declares the same as is written above.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on November 3, 1983, at Los Angeles, California.

Sylvia De Martino
SYLVIA DE MARTINO

DECLARATION OF OTILIA RUIZ

AS TYPED

I declare, under penalty of perjury, that the following is true and correct.

My name is Otilia Ruiz and I live at 206 West 6th Street, #1338, Los Angeles, California 90014; no telephone.

I was on the General Relief program since about May of 1983.

In October 1983 I was tranferred to a training program with the Department of Community Services. My worker, Mr. Rodriguez and my husband are the only ones who know of my situation. I do not read or write English.

I was told to report to work at the County hospital - Laundry Department on Tuesdays and Thursdays. I've never been able to report to work because of a fractured arm. Disability Reports have been provided to the Department of Public Social Services.

My most recent visit to my doctor was December 5, 1983. I am still disabled: Next appt. 12/14/83.

The S.C.R.E.P. Notice was mailed to me. I know of no reason why I should be terminated. My absences have been excused.

My husband read the above statements to me.

OTILIA P. RUIZ

I declare under penalty of perjury that the ~~foregoing~~ following is true and correct.

My name is Otilia Ruiz and I live at 300 west 11th street #1335 Los Angeles Calif 90015, no Telephone.

I was on the General Relief program since about May of 1983

In Oct. 1983 I was Transferred to a Training program w/ THE Dept. of Community Services. My worker, Mr. Rodriguez and my Husband are THE only ones who know of my situation I do not Read or write ENGLISH

I was told to Report to work at THE County hospital - Laundry Dept. on Tuesdays and Thursdays I've never been able to Report to work because of a Fractured arm. Disability Reports have been provided to THE Department of Public Social Services

My most recent visit to my doctor was Dec. 5, 1983 I am still disabled next app't 12/14/83

THE [illegible] Notice was mailed to me. I know of no Reason why I should be Terminated. My absences have been excused.

My husband Read THE above statements to me

Otilia P Ruiz

DECLARATION OF ERNESTO TARANGO

I, ERNESTO TARANGO, declare and if called upon I could and would competently testify under oath as follows:

1. I live in Los Angeles County at 208 South Hill Street, Los Angeles, California.

2. I have received General Relief from the County of Los Angeles for about 2 years.

3. At the end of September, my Department of Public Social Services Eligibility Worker Norman Rodriguez told me that I would be given job training. Up until that time, I had worked at County Work Fare projects as part of my getting General Relief.

4. On October 5, 1983, I began working on a different project in the beach areas of Los Angeles County. I have worked every Wednesday and Thursday since October 5. I report to the County DPSS office at 4th Place at about 8:00 a.m. on Wednesday and Thursday mornings. A bus picks me up at that DPSS office and drives me to the beach areas. I work from 9:00 a.m. until 2:00 p.m. doing such things as sweeping sidewalks, filling sand bags, painting strips on parking lots, cleaning up the beach, and trimming grass and shrubbery.

5. On this special work project I am given an hour for lunch from 11:30 a.m. until 12:30 p.m. Lunch is not provided to me on that project.

6. At the end of the work day at about 2:00 p.m. a bus picks me and the other workers up and takes us back to a point in downtown Los Angeles.

///

///

7. On about November 4, 1983, when I picked up my stipend at the Department of Community Services, I was given several pieces of paper, copies of which are included with this statement. Those papers are written in English, and I did not know what the papers said. I took them to Legal Aid Foundation of Los Angeles where workers there told me what the papers say.

8. I understand from the people at Legal Aid Foundation that the papers that I was given tell me that I should go to two different places on November 18 to pick up my second check for November.

9. I also understand that the papers tell me that I must do 20 job searches. However, one of the papers tell me that I must report 10 job searches, but does not tell me when or to whom I should turn in that report.

10. I had worked for several years in the construction industry. I would like the opportunity to have job training to develop skills with which I might find a job. However, I do not believe that filling sand bags and sweeping sidewalks are skills with which I will find a job. I would like to be put in a real job training program, for instance, in hospital maintenance.

11. This declaration has been translated and read to me in Spanish.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of November, 1983 at Los Angeles, California.

Ernesto Tarango

ERNESTO TARANGO

VERIFICATION

Yo, ERNESTO TARANGO, certifico que la declaración arriba escrita fue leida a mi en español y que se el contenimiento de esta. Yo declaro bajo pena de perjurio que la precedente es cierta y correcta. Ejecutada el dia de 7 de noviembre, 1983, en Los Angeles, California.

Ernesto Tarango
ERNESTO TARANGO

DECLARATION OF INTERPRETER

I, CARMEN OLGUIN, declare that I have accurately translated the foregoing Declaration of Ernesto Tarango and the above verification from English into Spanish and read them to Ernesto Tarango.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 7, 1983, at Los Angeles, California.

Carmen Olguin
CARMEN OLGUIN

DECLARATION OF ROBERT TAYLOR

I, Robert Taylor, declare as follows:

1. I have been receiving County assistance since approximately July of this year. I have been laid off since March, 1982. I used to be an ironworker. I have been looking for work but haven't been able to find anything. I was on General Relief until I was transferred to the jobs program in October.

2. I received a notice (Attached here as Exhibit A.) that I am being terminated from the County job program. I don't understand why I am being terminated. The notice says "The reason for your termination is your non-attendance at your assigned worksite." (Exhibit A.) But I never received any assignment to a worksite.

3. This program has never been really explained to me. The only information I received about job site assignments and termination was on postcards I got in the mail telling me where to pick up my checks. On these cards it said if I missed three days a month at the job site, I could be terminated from the program.

4. In October and November I got cards in the mail telling me to pick up my checks at the DCS office on 78th and Compton. I picked up my checks in October and November.

5. In the first part of November I told the lady at DCS giving out checks I hadn't been assigned to a work site. She said if I hadn't been assigned not to worry about it.

//

6. When I went to pick up my first check in November someone at the DCS office was passing out job search forms. I was given a form to fill out for twenty job searches which I was told to bring back the second part of November. The same job search form had another form stapled to it which said if I had not been assigned to a work site or a training program I would be assigned in the following weeks.

7. I did my twenty job searches and in late November turned those papers in.

8. In December I didn't receive a card telling me where to pick up my check. I also didn't receive a job assignment.

9. I went to the DCS office on December 5 to see about the check. At the office there was a sign saying that checks could be picked up for the 5th and 6th. I picked up my check. I was given no other forms.

10. I got the notice about my termination hearing on about December 7, 1983. When I got the notice I called the DCS number (974-7374). No one would discuss my case with me. I was given the number to Legal Aid.

11. I have always done everything the County has asked me to do. I don't understand how the County can terminate me for not going to a worksite when I never got an assignment. I thought this was a program for school or training but I haven't gotten any training or education from the County.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13 day of December, 1983, at Los Angeles, California.

Robert E. Taylor
ROBERT TAYLOR
Declarant

DECLARATION OF EVA VERA

I, EVA VERA, declare:

1. I am employed by Legal Aid Foundation in the capacity of a Legal Assistant.

2. On November 21, 1983, I interviewed a client by the name of ARTHUR BARRAGAN regarding his termination of a county DPSS job training program conducted by the Mexican American Opportunity Foundation (herein M.A.O.F.).

3. The client stated that on November 7, 1983 he was experiencing pain and discomfort from a prior hernia operation. On that day he called and spoke to his instructor Paul Madrid who advised the client that there would be "no problem" with his participation in the program as long as when he returned he brought with him a Doctor's Verification of Treatment.

4. The client states that he was unable to secure immediate medical treatment as the County health facilities of Roybal Medical Clinic and U.S.C. County Medical Center were back logged with appointments. The earliest appointment date given to the client was November 15, 1983 (see attached Medical Records (A) and Doctor's Statement (B)).

5. The client was scheduled for a subsequent one day in patient surgical treatment to be conducted on Dec. 7, 1983. (See attached C).

6. On November 15, the client states he returned to M.A.O.F. and gave his instructor Mr. Madrid, his Doctor's Verification.

7. Mr. Madrid advised the client to go pick up his check.

8. The client proceeded to do so but was at this point advised he was terminated from the program by the clerk dispersing the

checks.

9. The client then attempted to speak to the Project Director Mr. Moreno who stated that the client was terminated for failure to appear before November 10th.

10. The client then came into our office on November 21, 1983 where he stated the above facts.

11. I proceeded to call his instructor, Mr. Madrid who stated to me that he remembered the conversation with the client on November 7, but that the matter was out of his hands and I had to speak with the Project Director Mr. Moreno.

12. I attempted to speak with Mr. Moreno but was unable to until November 22, at which point he stated that he was following County Rules and Regulations and could not reinstate Mr. Barragan.

13. I then asked Mr. Moreno about the Program's Notice of Termination which was never given to the client and secondly about the Program's grievance procedures whether or not these were explained to the client.

14. Mr. Moreno was unable to respond and advised me that I should speak to Mr. Bill McCowen of the County about this. He gave me the number to contact Mr. McCowen, (260-2848).

15. I was unable to reach Mr. McCowen directly but on November 23, 1983 he called my office.

16. On that day I again asked about the Notice of Termination and Grievance Procedures.

17. Mr. McCowen advised me that in any event the participation in County System are throughly advised of their responsibilities at the point that they enter into the County System and that Mr. Barragan as well as all County participants sign a statement wherein

they acknowledge their understanding of the reporting requirements.

18. Mr. McCowen then stated that due to the above, there is therefore no need for the County to provide the client with a specific Notice of Termination.

19. I then asked Mr. McCowen for a copy of such a signed Statement signed by our client for our records. (See attached D)

20. I was advised by our Directing Attorney, Ms. Marie Janiewski to speak to either Vince Terry or Barbara Chavan.

21. On November 24, 1983, I spoke with Ms. Chavan who stated she will look into the problem and get back to me.

23. Later that day Ms. Chavan called me and informed me basically that Mr. McCowen had given me mis information and that as of this date there has been no termination policy in effect as the guidelines have not been passed by the City.

24. Ms. Chavan also stated that the client would receive all the checks he was entitled to on Monday, November 28, 1983.

25. I am to call Ms. Chavan at 10:00 a.m. to confirm a time for the client to pick up his checks for November.

26. On November 28, I again spoke with Ms. Chavan.

27. The facts stated in this declaration are personally known to me and I have first hand knowledge of them. If I am called as a witness, I could and would competently testify thereto under oath.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 28, 1983 at Los Angeles, California

Eva Vera
EVA VERA

STATEMENT OF NATHANIEL EARL SMITH, SR., PARTICIPANT AT EAST LOS ANGELES EMPLOYMENT TRAINING CENTER, JTPA TRAINING SITE

Mr. SMITH. Yes. My name is Nathaniel Earl Smith, Sr. I'm currently a participant at the East Los Angeles Employment Training Center, a JTPA training site.

I have an AA degree in business administration, but, because of the recession, I had become unemployed. In May 1983, I became a GR recipient.

In the last week of September 1983, I was notified that I was terminated from GR and I was to enter into a new JTPA program. We had had rumors that the new program was going to start but no one had informed us what the program consisted of or the jobs or the training—what it was supposed to be.

In the first week of October, I was told to report to the Hall of Records to be referred to a job training site.

At the job training site, we were placed upon training 5 days a week, 6 hours a day, which is 30 hours a week, times 4 weeks, which was 120 hours a month for $228 a month, which is $1.90 an hour. I was placed in a typing class. I have already had typing I and II. I got A's in both of them. There was no prescreening asking me what kind of class I wanted to be in, what kind of skills I had or what kind of training would I like to participate in.

At the training site they have manual typewriter repair classes. Well, there are very few corporations, institutions, or businesses that use manual typewriters today.

Also at the training site they train people for wood shop, which I received in high school.

The subcontractors, which are the East Los Angeles Training Center, was already in preexistence for refugees, people who were coming from other countries to learn basic English and basic skills—skills they will need in order to function in America. It was not set up for any kind of JTPA program. The JTPA program materials and things never materialized. We just existed off what was already there.

There were a lot of people in the class who are Hispanic and black who were receiving typing II, but their typing is in a vacuum because you can't go somewhere and say, "I have a typing skill," and have no related experience to say what I'm going to use this typing skill for.

The PIC participants say the jury is still out, and the jury is still out, but the verdict is in: the training is no good. It doesn't have to wait for somebody to hit them over the head. To say people erroneously said that we were happy at being forced into training that we did not want. But if people would visit my training site or any of the training sites where people are trained on the JTPA funds to clean the beaches and still clean the hospital and janitorial duties, people would understand the real problem with this program. These people are not happy with this job training. They do not want this kind of job training.

We expected that we would be similar to the CETA program, where we would get minimum wage and on-the-job training. At the end of the training, we assume would have jobs. However, that has not taken place. The program is in the fifth month as far as my participation is concerned because we started in October. In March my training ends. There has been no interrelation with private industry to offer me a job with my typing that I'm supposed to have, I guess, There has been no training or job offers to anyone that I know at my training site that people have been able to take advantage of. There are just no jobs there. The training is just a farce as far as people are concerned. I don't know about the administration or all of the pros and cons of how good it is supposed to be, how it is supposed to work as the program. But as far as we're concerned, we at that particular training site do not have no jobs. We didn't receive any kind of training that would prepare us for jobs, and it's just a waste of time.

Mr. DYMALLY. Mr. Smith, you obviously don't live in east Los Angeles, do you?

Mr. SMITH. No, sir. I live in downtown skid row because of the $228 a month.

Mr. DYMALLY. Who pays your transportation to east Los Angeles?

Mr. SMITH. The stipend of $228 is supposed to include a $20 a month bus pass, but it does not. I have to get there. If I don't get there, I'm terminated. I like to eat, so I get there.

Mr. DYMALLY. So you have to pay for your own transportation.

Mr. SMITH. Yes, sir.

Mr. HAWKINS. Thank you. I think your testimony is very valuable.

Mr. MARTINEZ. Mr. Chairman.

Mr. HAWKINS. Yes, Mr. Martinez.

Mr. MARTINEZ. You referred to someone saying that the general recipient was really happy that they were forcing them to go to training.

Mr. SMITH. Yes, sir, the PIC——

Mr. MARTINEZ. Who was it that made that statement?

Mr. SMITH. A member from the PIC, the Private Industry Council, said that——

Mr. MARTINEZ. Oh, he was the one that said that they got that great job going door to door selling dog licenses.

Mr. SMITH. Yes. Right. Although I am unemployed and I would accept a job going door to door collecting dog tags, I don't want to work in that kind of job. It's just not what I'm really qualified to do.

Mr. MARTINEZ. My point is that he seems to feel that somebody would be ecstatic about a job like that. For how long?

Mr. SMITH. Yes. I mean as a temporary job to help you back on your feet, yes. That's a good job because you're getting paid a wage and you can save and get yourself something better. But to train people to become a dog tag collector, I don't think that's good training as far as a job prospect is concerned.

Mr. HAWKINS. Mr. Gross, could you answer a few questions?

Mr. GROSS. Sure. First, if I could respond to Mr. Dymally's question about the transportation.

Mr. HAWKINS. Yes.

Mr. GROSS. Just to clarify that.

I don't know what Mr. Smith himself is receiving. On paper, people are supposed to receive $228 a month for their stipend, plus a $20 transportation allowance, for a total of $248. However, as I explained, the checks come in two parts, so, on the first part of the month, they get the $114, plus the $20 bus pass. Since most people have to pay their rent at the beginning of the month and, you know, probably have utility bills, I don't know how they are supposed to be able to keep $20 out to use for the bus pass. In fact, at the beginning of the program, they were only giving them $10 on the first and $10 on the 15th. We asked them, "How can you buy a bus pass—a $20 bus pass when you only get $10 at the beginning?" So then, after bringing that up before the court, they agreed to change that.

I'm sorry, Mr. Hawkins.

Mr. HAWKINS. No. That's very, very helpful.

In terms of those who drop out of the program, and I imagine there are some who do drop out or are terminated for various reasons, what happens to those? Do they go back on general relief? And, if so, in what way would that be expedited? What really happens?

Mr. GROSS. There have been problems with that. If someone is found to have violated one of the requirements of the program—and that would include, attending their work site or their job training or reporting any changes, if they have any changes in income or living circumstances—they're supposed to report them within five days, although no one knows who to report them to since no one has eligibility workers assigned to them. If they foul up on one of those requirements, they are terminated, and then they are given a 60-day penalty. So they are not permitted to apply again for general relief for 60 days. There's absolutely no support except for food stamps to which they would be entitled.

After the 60 days of living in the streets, I suppose, they can then reapply for general relief, and then they are reassigned to the JTPA program.

Mr. SMITH. That takes another 35 to 40 days.

Mr. GROSS. Right, it does. The assessment process——

Mr. HAWKINS. Have you had any of those who have gone that 60-day period? Has there been enough time to build up any experience on what happens to those individuals?

Mr. GROSS. No; we haven't. Part of that reason is because, as you heard earlier, the department wasn't set up to terminate people for several months. They didn't have any procedures under Federal constitutional law. They have to give people notice and a hearing before they can cut them off their stipend. They didn't have any procedures for doing that for about 3 months. When they finally started doing it, we attended some of the original hearings and the so-called hearing officers who had just been taken off other jobs the day before were given no evidence or anything. They had no files on the people. There was really no basis on which they could make a decision about whether the person should be terminated. So those original hearings were cancelled and there was another several weeks. So it wasn't until early January that anyone was officially terminated and given a 60-day penalty. So those people would still be suffering that penalty.

Mr. Hawkins. May I ask Mr. Boyle or Ms. Estrada to answer those questions. How long is the training period? Is every provider limited to a particular skill training program? What is really the duration of the training? What type of training is given?

Mr. Boyle. Well, to answer your question, the length of time available to a service provider to train a general relief recipient is actually dictated by the participant costs in the contract. This was one of my points, that, in this program, the county, when it began negotiations, insisted on very low, unrealistic training costs. For example, the participant's training cost is $1,448. This cost does include the welfare stipends of $228 a month, which would be deducted from the $1,448. This means that no service provider could keep a general relief recipient in training for more than generally 8 to 12 weeks simply because there would not be enough money remaining in the participant cost figure in order to pay rent and keep the agency open.

Mr. Hawkins. Let's get that as we go along now.

The stipend or the benefit payment is deducted———

Mr. Boyle. Is charged to the participant cost, yes.

Mr. Hawkins. To the participant cost?

Mr. Boyle. Right.

Mr. Hawkins. So that, roughly, I would estimate that, in about 5 months, that $1,488 would have been used up in that benefit cost.

Mr. Boyle. Right.

Mr. Hawkins. What goes to the training?

Mr. Boyle. Of course, each service provider has a certain overhead expense, so that what has happened is that most of the training programs are in the category of 8 to 12 weeks simply because an agency cannot afford to keep these people in training any longer than that.

Now the problem is that—and I believe I can speak for all of the service providers who have expressed a view on this—we really should have a 6-months' training program for most general relief recipients.

Now I questioned the county repeatedly about the insistence upon the low participant costs. Finally, I was told by one official that the reason for this was that the county wanted to get a large volume of people going through these programs in the hope that a substantial number of them would simply drop out of the training. But, in terms of trying to train people to make them self-sustaining in a highly competitive job market, we need them for at least 6 months. So the design of this program has virtually doomed it to failure in most cases simply because we cannot take people and train them to be competitive in the job market in 8 to 12 weeks. It just can't be done.

Mr. Hawkins. Well, that's clearly inadequate.

Mr. Boyle. Yes.

Mr. Hawkins. During that period of time, what about supportive services such as health benefits? We've already dealt with transportation costs. If they need some particular counseling or psychiatric care and so forth, are these other items provided during that period of time by the county?

Ms. Estrada. The ones you mentioned, transportation and health costs, are provided by the county. There are very limited supportive services in other respects and there is almost no provision for child care in the current job training plan.

Mr. **Hawkins**. So you don't have too many women on the program to begin with.

Ms. **Estrada**. That's true.

Mr. **Hawkins**. I guess the men don't have too many children to provide for.

Ms. **Estrada**. To a large degree, the county has shifted many of the social welfare aspects of each individual's needs to the service providers, which is one of the complaints that they have in that they aren't set up to take over this responsibility from the county.

Mr. **Boyle**. That's right. We really are not. What has happened, Congressman, is that, as general relief recipients have been referred to subcontractors without any assessment. Many of these people are suffering from serious alcohol, drug abuse, and many other physical problems. What has happened is that, because so many of the service providers have a tradition of social service, they have taken upon themselves to try to help these people even before they could begin training. This burden has largely been placed on the service providers, and we do not think that that is a proper responsibility. To a very large extent, I think it is the fact that there seems to have been no assessment of these people. In fact, we had one man testify today and he had had no assessment before he was assigned.

So, to answer your question, the supportive services allegedly provided by the county in the view of most service providers are very poor.

Mr. **Hawkins**. What type of jobs would they be trained for ordinarily?

Mr. **Boyle**. A large variety of jobs—clerical jobs, beginning computer programing, child care services, food service, maintenance work, auto repair, etc.

Mr. **Hawkins**. Mr. Dymally has to leave now.

We thank you, Mr. Dymally, for your attendance.

Ms. **Estrada**. I just have one brief comment.

My understanding of the health benefits is that it comes out of county funds, not out of the JTPA 15 percent supportive services category. In our lawsuit, the judge has seen fit to categorize these people as a continuation of the welfare program since the county has an obligation under the State law to provide for its indigents. That wasn't necessarily an argument we made affirmatively, but it's something that the judge has definitely seen a continuation of.

Mr. **Hawkins**. Ms. Estrada, you made a reference to the various segments that should be served. In section 141(a) of JTPA, it says, I think rather clearly, that each job training plan shall provide employment and training opportunities to those who can benefit from and are most in need of such opportunities, and shall make efforts to provide equitable services among substantial segments of the eligible population. I think that's rather clear and I think it supports your contention. I would think that your point that substantial segments of the eligible population are not being served, I think, is certainly contrary to what the law states.

Ms. **Estrada**. I agree with you, and that is pretty much why we were very disappointed to have the State review and to have a certain section of JTPA cited back to us, one which we didn't even allege or raise, and basically told us that the GR individuals are eligible, therefore, the county has not violated JTPA.

Mr. Hawkins. Well, the thing is they looked possibly at that section but then concluded that, if an eligible segment was being served, that complied with this act. It certainly is not a reasonable construction of that section of the law. The mere fact that some of the eligible population was being served did comply with this requirement is certainly a farfetched interpretation of the law. I would certainly say that substantial segments of the eligible population were not being served, and they just simply, I think, looked at it backwards rather than complying with the act.

Ms. Estrada. I agree totally. I think you have to read that section with the other sections requiring equitable services to AFDC recipients and nondiscrimination to all protected groups.

Mr. Hawkins. Precisely. Well, they didn't even get past that section.

Mr. Martinez.

Mr. Martinez. Nothing, except to say that, in trying to justify their position, they would take the broadest interpretation and then conclude that they have complied. I don't think they have.

Mr. Hawkins. Without objection, the statement from Senator Diane Watson will be entered into the record at the conclusion of this panel.

Again, we would like to thank the panel and you, Mr. Smith, especially, for the very graphic way in which you described your plight, which I think is very typical of the plight of many others. I think it's a tribute to you that you came forth and represented this group today. I'm indeed thankful for it.

Mr. Smith. Thank you very much, Mr. Chairman.

Mr. Hawkins. That concludes the hearing in Los Angeles.

[Whereupon, the hearing in the above-entitled matter, was concluded at 1:40 p.m.]

[Material submitted for inclusion in the record follows:]

APPENDIX

Public Law 97-300
97th Congress

An Act

Oct. 13, 1982
[S. 2036]

To provide for a job training program and for other purposes.

Job Training Partnership Act.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SHORT TITLE; TABLE OF CONTENTS

29 USC 1501 note.

SECTION 1. This Act may be cited as the "Job Training Partnership Act".

TABLE OF CONTENTS

Sec. 1. Short title; table of contents.
Sec. 2. Statement of purpose.
Sec. 3. Authorization of appropriations.
Sec. 4. Definitions.

TITLE I—JOB TRAINING PARTNERSHIP

PART A—SERVICE DELIVERY SYSTEM

Sec. 101. Establishment of service delivery areas.
Sec. 102. Establishment of private industry council.
Sec. 103. Functions of private industry council.
Sec. 104. Job training plan.
Sec. 105. Review and approval of plan.
Sec. 106. Performance standards.
Sec. 107. Selection of service providers.
Sec. 108. Limitation on certain costs.

PART B—ADDITIONAL STATE RESPONSIBILITIES

Sec. 121. Governor's coordination and special services plan.
Sec. 122. State job training coordinating council.
Sec. 123. State education coordination and grants.
Sec. 124. Training programs for older individuals.
Sec. 125. State labor market information programs.
Sec. 126. Authority of State legislature.
Sec. 127. Interstate agreements.

PART C—PROGRAM REQUIREMENTS FOR SERVICE DELIVERY SYSTEM

Sec. 141. General program requirements.
Sec. 142. Benefits.
Sec. 143. Labor standards.
Sec. 144. Grievance procedure.
Sec. 145. Prohibition against Federal control of education.

PART D—FEDERAL AND FISCAL ADMINISTRATIVE PROVISIONS

Sec. 161. Program year.
Sec. 162. Prompt allocation of funds.
Sec. 163. Monitoring.
Sec. 164. Fiscal controls; sanctions.
Sec. 165. Reports, recordkeeping, and investigations.
Sec. 166. Administrative adjudication.
Sec. 167. Nondiscrimination.
Sec. 168. Judicial review.
Sec. 169. Administrative provisions.
Sec. 170. Utilization of services and facilities.
Sec. 171. Obligational authority.

PART E—MISCELLANEOUS PROVISIONS

Sec. 181. Transition.
Sec. 182. Criminal provisions.
Sec. 183. Reference.
Sec. 184. Repealers.

TITLE II—TRAINING SERVICES FOR THE DISADVANTAGED

PART A—ADULT AND YOUTH PROGRAMS

Sec. 201. Allotment.
Sec. 202. Within State allocation.
Sec. 203. Eligibility for services.
Sec. 204. Use of funds.
Sec. 205. Exemplary youth programs.

PART B—SUMMER YOUTH EMPLOYMENT AND TRAINING PROGRAMS

Sec. 251. Authorization of appropriations; allotment and allocation.
Sec. 252. Use of funds.
Sec. 253. Limitations.
Sec. 254. Applicable provisions.

TITLE III—EMPLOYMENT AND TRAINING ASSISTANCE FOR DISLOCATED WORKERS

Sec. 301. Allocation of funds.
Sec. 302. Identification of dislocated workers.
Sec. 303. Authorized activities.
Sec. 304. Matching requirement.
Sec. 305. Program review.
Sec. 306. Consultation with labor organizations.
Sec. 307. Limitations.
Sec. 308. State plans; coordination with other programs.

TITLE IV—FEDERALLY ADMINISTERED PROGRAMS

PART A—EMPLOYMENT AND TRAINING PROGRAMS FOR NATIVE AMERICANS AND MIGRANT AND SEASONAL FARMWORKERS

Sec. 401. Native American programs.
Sec. 402. Migrant and seasonal farmworker programs.

PART B—JOB CORPS

Sec. 421. Statement of purpose.
Sec. 422. Establishment of the Job Corps.
Sec. 423. Individuals eligible for the Job Corps.
Sec. 424. Screening and selection of applicants: general provisions.
Sec. 425. Screening and selection: special limitations.
Sec. 426. Enrollment and assignment.
Sec. 427. Job Corps centers.
Sec. 428. Program activities.
Sec. 429. Allowances and support.
Sec. 430. Standards of conduct.
Sec. 431. Community participation.
Sec. 432. Counseling and job placement.
Sec. 433. Experimental and developmental projects and coordination with other programs.
Sec. 434. Advisory boards and committees.
Sec. 435. Participation of the States.
Sec. 436. Application of provisions of Federal law.
Sec. 437. Special provisions.
Sec. 438. General provisions.
Sec. 439. Donations.

PART C—VETERANS' EMPLOYMENT PROGRAMS

Sec. 441. Programs authorized.

PART D—NATIONAL ACTIVITIES

Sec. 451. Multistate programs.
Sec. 452. Research and demonstration.
Sec. 453. Pilot projects.
Sec. 454. Evaluation.

Sec. 455. Training and technical assistance.

PART E—LABOR MARKET INFORMATION

Sec. 461. Labor market information; availability of funds.
Sec. 462. Cooperative labor market information program.
Sec. 463. Special Federal responsibilities.
Sec. 464. National Occupational Information Coordinating Committee.
Sec. 465. Job bank program.

PART F—NATIONAL COMMISSION FOR EMPLOYMENT POLICY

Sec. 471. Statement of purpose.
Sec. 472. Commission established.
Sec. 473. Functions of the Commission.
Sec. 474. Administrative provisions.
Sec. 475. Reports.

PART G—TRAINING TO FULFILL AFFIRMATIVE ACTION OBLIGATIONS

Sec. 481. Affirmative action.

TITLE V—MISCELLANEOUS PROVISIONS

Sec. 501. Amendments to the Wagner-Peyser Act.
Sec. 502. Amendments to part C of title IV of the Social Security Act.
Sec. 503. Earnings disregard.
Sec. 504. Enforcement of Military Selective Service Act.

STATEMENT OF PURPOSE

29 USC 1501.

SEC. 2. It is the purpose of this Act to establish programs to prepare youth and unskilled adults for entry into the labor force and to afford job training to those economically disadvantaged individuals and other individuals facing serious barriers to employment, who are in special need of such training to obtain productive employment.

AUTHORIZATION OF APPROPRIATIONS

29 USC 1502. *Post*, pp. 1358, 1368.

SEC. 3. (a)(1) There are authorized to be appropriated to carry out part A of title II and title IV (other than part B of such title) such sums as may be necessary for fiscal year 1983 and for each succeeding fiscal year.

(2) From the amount appropriated pursuant to paragraph (1) for any fiscal year, an amount equal to not more than 7 percent of the total amount appropriated pursuant to this section shall be available to carry out parts A, C, D, E, F, and G of title IV.

Post, pp. 1368, 1380, 1381, 1383, 1387, 1390.

(3) Of the amount so reserved under paragraph (2)—

(A) 5 percent shall be available for part C of title IV, and

(B) $2,000,000 shall be available for part F of title IV.

Post, p. 1364.

(b) There are authorized to be appropriated to carry out part B of title II such sums as may be necessary for fiscal year 1983 and for each succeeding fiscal year.

Post, p. 1364.

(c) There are authorized to be appropriated to carry out title III such sums as may be necessary for fiscal year 1983 and for each succeeding fiscal year.

(d) There are authorized to be appropriated $618,000,000 for fiscal year 1983, and such sums as may be necessary for each succeeding fiscal year, to carry out part B of title IV of this Act.

Post, p. 1347.

(e) The authorizations of appropriations contained in this section are subject to the program year provisions of section 161.

DEFINITIONS

SEC. 4. For the purposes of this Act, the following definitions apply: 29 USC 1503.

(1) The term "academic credit" means credit for education, training, or work experience applicable toward a secondary school diploma, a postsecondary degree, or an accredited certificate of completion, consistent with applicable State law and regulation and the requirements of an accredited educational agency or institution in a State.

(2) The term "administrative entity" means the entity designated to administer a job training plan under section 103(b)(1)(B).

(3) The term "area of substantial unemployment" means any area of sufficient size and scope to sustain a program under part A of title II of this Act and which has an average rate of unemployment of at least 6.5 percent for the most recent twelve months as determined by the Secretary. Determinations of areas of substantial unemployment shall be made once each fiscal year.

(4) The term "chief elected official" includes—

(A) in the case of a State, the Governor;

(B) in the District of Columbia, the mayor; and

(C) in the case of a service delivery area designated under section 101(a)(4)(A)(iii), the governing body.

(5) The term "community-based organizations" means private nonprofit organizations which are representative of communities or significant segments of communities and which provide job training services (for example, Opportunities Industrialization Centers, the National Urban League, SER-Jobs for Progress, United Way of America, Mainstream, the National Puerto Rican Forum, National Council of La Raza, 70,001, Jobs for Youth, organizations operating career intern programs, neighborhood groups and organizations, community action agencies, community development corporations, vocational rehabilitation organizations, rehabilitation facilities (as defined in section 7(10) of the Rehabilitation Act of 1973), agencies serving youth, 29 USC 706. agencies serving the handicapped, agencies serving displaced homemakers, union-related organizations, and employer-related nonprofit organizations), and organizations serving nonreservation Indians (including the National Urban Indian Council), as well as tribal governments and Native Alaskan groups.

(6) Except as otherwise provided therein, the term "council" means the private industry council established under section 102.

(7) The term "economic development agencies" includes local planning and zoning commissions or boards, community development agencies, and other local agencies and institutions responsible for regulating, promoting, or assisting in local economic development.

(8) The term "economically disadvantaged" means an individual who (A) receives, or is a member of a family which receives, cash welfare payments under a Federal, State, or local welfare program; (B) has, or is a member of a family which has, received a total family income for the six-month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, and welfare payments)

which, in relation to family size, was not in excess of the higher of (i) the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, or (ii) 70 percent of the lower living standard income level; (C) is receiving food stamps pursuant to the Food Stamp Act of 1977; (D) is a foster child on behalf of whom State or local government payments are made; or (E) in cases permitted by regulations of the Secretary, is an adult handicapped individual whose own income meets the requirements of clause (A) or (B), but who is a member of a family whose income does not meet such requirements.

(9) The term "Governor" means the chief executive of any State.

(10) The term "handicapped individual" means any individual who has a physical or mental disability which for such individual constitutes or results in a substantial handicap to employment.

(11) The term "Hawaiian native" means any individual any of whose ancestors were natives, prior to 1778, of the area which now comprises the State of Hawaii.

(12) The term "institution of higher education" means any institution of higher education as that term is defined in section 1201(a) of the Higher Education Act of 1965. 20 USC 1141.

(13) The term "labor market area" means an economically integrated geographic area within which individuals can reside and find employment within a reasonable distance or can readily change employment without changing their place of residence. Such areas shall be identified in accordance with criteria used by the Bureau of Labor Statistics of the Department of Labor in defining such areas or similar criteria established by a Governor.

(14) The term "local educational agency" means such an agency as defined in section 195(10) of the Vocational Education Act of 1963. 20 USC 2461.

(15) The term "low-income level" means $7,000 with respect to income in 1969, and for any later year means that amount which bears the same relationship to $7,000 as the Consumer Price Index for that year bears to the Consumer Price Index for 1969, rounded to the nearest $1,000.

(16) The term "lower living standard income level" means that income level (adjusted for regional, metropolitan, urban, and rural differences and family size) determined annually by the Secretary based on the most recent "lower living family budget" issued by the Secretary.

(17) The term "offender" means any adult or juvenile who is or has been subject to any stage of the criminal justice process for whom services under this Act may be beneficial or who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

(18) The term "postsecondary institution" means an institution of higher education as that term is defined in section 481(a)(1) of the Higher Education Act of 1965. 20 USC 1088.

(19) The term "private sector" means, for purposes of the State job training councils and private industry councils, persons who are owners, chief executives or chief operating officers of private for-profit employers and major nongovernmental employers, such as health and educational institutions or other

executives of such employers who have substantial management or policy responsibility.

(20) The term "public assistance" means Federal, State, or local government cash payments for which eligibility is determined by a needs or income test.

(21) The term "Secretary" means the Secretary of Labor.

(22) The term "State" means any of the several States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, the Northern Mariana Islands, American Samoa, and the Trust Territory of the Pacific Islands.

(23) The term "State educational agency" means such an agency as defined in section 195(11) of the Vocational Education Act of 1963. 20 USC 2461.

(24) The term "supportive services" means services which are necessary to enable an individual eligible for training under this Act, but who cannot afford to pay for such services, to participate in a training program funded under this Act. Such supportive services may include transportation, health care, special services and materials for the handicapped, child care, meals, temporary shelter, financial counseling, and other reasonable expenses required for participation in the training program and may be provided in-kind or through cash assistance.

(25) The term "unemployed individuals" means individuals who are without jobs and who want and are available for work. The determination of whether individuals are without jobs shall be made in accordance with the criteria used by the Bureau of Labor Statistics of the Department of Labor in defining individuals as unemployed.

(26) The term "unit of general local government" means any general purpose political subdivision of a State which has the power to levy taxes and spend funds, as well as general corporate and police powers.

(27)(A) The term "veteran" means an individual who served in the active military, naval, or air service, and who was discharged or released therefrom under conditions other than dishonorable.

(B) The term "disabled veteran" means (i) a veteran who is entitled to compensation under laws administered by the Veterans' Administration, or (ii) an individual who was discharged or released from active duty because of service-connected disability.

(28) The term "vocational education" has the meaning provided in section 195(1) of the Vocational Education Act of 1963.

TITLE I—JOB TRAINING PARTNERSHIP

PART A—SERVICE DELIVERY SYSTEM

ESTABLISHMENT OF SERVICE DELIVERY AREAS

SEC. 101. (a)(1) The Governor shall, after receiving the proposal of the State job training coordinating council, publish a proposed designation of service delivery areas for the State each of which— 29 USC 1511.

(A) is comprised of the State or one or more units of general local government;

(B) will promote effective delivery of job training services; and

(C)(i) is consistent with labor market areas or standard metropolitan statistical areas, but this clause shall not be construed to require designation of an entire labor market area; or

(ii) is consistent with areas in which related services are provided under other State or Federal programs.

(2) The Council shall include in its proposal a written explanation of the reasons for designating each service delivery area.

(3) Units of general local government (and combinations thereof), business organizations, and other affected persons or organizations shall be given an opportunity to comment on the proposed designation of service delivery areas and to request revisions thereof.

Request.

(4)(A) The Governor shall approve any request to be a service delivery area from—

(i) any unit of general local government with a population of 200,000 or more;

(ii) any consortium of contiguous units of general local government with an aggregate population of 200,000 or more which serves a substantial part of a labor market area; and

(iii) any concentrated employment program grantee for a rural area which served as a prime sponsor under the Comprehensive Employment and Training Act.

Post, p. 1357.

(B) The Governor may approve a request to be a service delivery area from any unit of general local government or consortium of contiguous units of general local government, without regard to population, which serves a substantial portion of a labor market area.

(C) If the Governor denies a request submitted under subparagraph (A) and the entity making such request alleges that the decision of the Governor is contrary to the provisions of this section, such entity may appeal the decision to the Secretary, who shall make a final decision within 30 days after such appeal is received.

(b) The Governor shall make a final designation of service delivery areas within the State. Before making a final designation of service delivery areas for the State, the Governor shall review the comments submitted under subsection (a)(3) and requests submitted under subsection (a)(4).

(c)(1) In accordance with subsection (a), the Governor may redesignate service delivery areas no more frequently than every two years. Such redesignations shall be made not later than 4 months before the beginning of a program year.

(2) Subject to paragraph (1), the Governor shall make such a redesignation if a petition to do so is filed by an entity specified in subsection (a)(4)(A).

(3) The provisions of this subsection are subject to section 105(c).

ESTABLISHMENT OF PRIVATE INDUSTRY COUNCIL

29 USC 1512.

SEC. 102. (a) There shall be a private industry council for every service delivery area established under section 101, to be selected in accordance with this subsection. Each council shall consist of—

(1) representatives of the private sector, who shall constitute a majority of the membership of the council and who shall be owners of business concerns, chief executives or chief operating officers of nongovernmental employers, or other private sector executives who have substantial management or policy responsibility; and

(2) representatives of educational agencies (representative of all educational agencies in the service delivery area), organized labor, rehabilitation agencies, community-based organizations, economic development agencies, and the public employment service.

Chairman.

(b) The Chairman of the council shall be selected from among members of the council who are representatives of the private sector.

Private sector representatives.

(c)(1)(A) Private sector representatives on the council shall be selected from among individuals nominated by general purpose business organizations after consulting with, and receiving recommendations from, other business organizations in the service delivery area. The number of such nominations shall be at least 150 percent of the number of individuals to be appointed under subsection (a)(1). Such nominations, and the individuals selected from such nominations, shall reasonably represent the industrial and demographic composition of the business community. Whenever possible, at least one-half of such business and industry representatives shall be representatives of small business, including minority business.

Definitions.

(B) For the purpose of this paragraph, the term—

(i) "general purpose business organizations" means organizations which admit to membership any for-profit business operating within the service delivery area; and

(ii) "small business" means private for-profit enterprises employing 500 or fewer employees.

Education representatives.

(2) Education representatives on the council shall be selected from among individuals nominated by local educational agencies, vocational education institutions, institutions of higher education, or general organizations of such agencies or institutions, and by private and proprietary schools or general organizations of such schools, within the service delivery area.

(3) The remaining members of the council shall be selected from individuals recommended by interested organizations. Labor representatives shall be recommended by recognized State and local labor organizations or appropriate building trades councils.

Chief elected official.

(d)(1) In any case in which there is only one unit of general local government with experience in administering job training programs within the service delivery area, the chief elected official of that unit shall appoint members to the council from the individuals nominated or recommended under subsection (c).

(2) In any case in which there are two or more such units of general local government in the service delivery area, the chief elected officials of such units shall appoint members to the council from the individuals so nominated or recommended in accordance with an agreement entered into by such units of general local government. In the absence of such an agreement, the appointments shall be made by the Governor from the individuals so nominated or recommended.

(e) The initial number of members of the council shall be determined—

(1) by the chief elected official in the case described in subsection (d)(1),

(2) by the chief elected officials in accordance with the agreement in the case described in subsection (d)(2), or

(3) by the Governor in the absence of such agreement.

Thereafter, the number of members of the council shall be determined by the council.

Term. (f) Members shall be appointed for fixed and staggered terms and may serve until their successors are appointed. Any vacancy in the membership of the council shall be filled in the same manner as the original appointment. Any member of the council may be removed for cause in accordance with procedures established by the council.

(g) The Governor shall certify a private industry council if the Governor determines that its composition and appointments are consistent with the provisions of this subsection. Such certification shall be made or denied within 30 days after the date on which a list of members and necessary supporting documentation are submitted to the Governor. When the Governor certifies the council, it shall be convened within 30 days by the official or officials who made the appointments to such council under subsection (d).

(h) In any case in which the service delivery area is a State, the State job training coordinating council or a portion of such council may be reconstituted to meet the requirements of this section.

FUNCTIONS OF PRIVATE INDUSTRY COUNCIL

29 USC 1513. SEC. 103. (a) It shall be the responsibility of the private industry council to provide policy guidance for, and exercise oversight with respect to, activities under the job training plan for its service delivery area in partnership with the unit or units of general local government within its service delivery area.

(b)(1) The council, in accordance with an agreement or agreements with the appropriate chief elected official or officials specified in subsection (c), shall—

(A) determine procedures for the development of the job training plan, which may provide for the preparation of all or any part of the plan (i) by the council, (ii) by any unit of general local government in the service delivery area, or by an agency thereof, or (iii) by such other methods or institutions as may be provided in such agreement; and

(B) select as a grant recipient and entity to administer the job training plan (which may be separate entities), (i) the council, (ii) a unit of general local government in its service delivery area, or an agency thereof, (iii) a nonprofit private organization or corporation, or (iv) any other agreed upon entity or entities.

(2) The council is authorized to provide oversight of the programs conducted under the job training plan in accordance with procedures established by the council. In order to carry out this paragraph, the council shall have access to such information concerning the operations of such programs as is necessary.

(c) For purposes of subsection (b), the appropriate chief elected official or officials means—

(1) the chief elected official of the sole unit of general local government in the service delivery area,

(2) the individual or individuals selected by the chief elected officials of all units of general local government in such area as their authorized representative, or

(3) in the case of a service delivery area designated under section 104(a)(4)(A)(iii), the representative of the chief elected official for such area (as defined in section 4(4)(C)).

(d) No job training plan prepared under section 104 may be submitted to the Governor unless (1) the plan has been approved by the council and by the appropriate chief elected official or officials

173

173

specified in subsection (c), and (2) the plan is submitted jointly by the council and such official or officials.

(e) In order to carry out its functions under this Act, the council— Budget.

(1) shall, in accordance with the job training plan, prepare and approve a budget for itself, and

(2) may hire staff, incorporate, and solicit and accept contributions and grant funds (from other public and private sources).

(f) As used in this section, the term "oversight" means reviewing, monitoring, and evaluating. "Oversight."

JOB TRAINING PLAN

SEC. 104. (a) No funds appropriated for any fiscal year may be provided to any service delivery area under this Act except pursuant to a job training plan for two program years which is prepared in accordance with section 103 and which meets the requirements of this section. 29 USC 1514.

(b) Each job training plan shall contain—

(1) identification of the entity or entities which will administer the program and be the grant recipient of funds from the State;

(2) a description of the services to be provided, including the estimated duration of service and the estimated training cost per participant;

(3) procedures for identifying and selecting participants and for eligibility determination and verification;

(4) performance goals established in accordance with standards prescribed under section 106,

(5) procedures, consistent with section 107, for selecting service providers which take into account past performance in job training or related activities, fiscal accountability, and ability to meet performance standards;

(6) the budget for two program years and any proposed expenditures for the succeeding two program years, in such detail as is determined necessary by the entity selected to prepare this portion of the plan pursuant to section 103(b)(1)(B) and to meet the requirements of section 108;

(7) a description of methods of complying with the coordination criteria contained in the Governor's coordination and special services plan;

(8) if there is more than one service delivery area in a single labor market area, provisions for coordinating particular aspects of individual service delivery area programs, including—

(A) assessments of needs and problems in the labor market that form the basis for program planning;

(B) provisions for ensuring access by program participants in each service delivery area to skills training and employment opportunities throughout the entire labor market; and

(C) coordinated or joint implementation of job development, placement, and other employer outreach activities;

(9) fiscal control, accounting, audit and debt collection procedures to assure the proper disbursal of, and accounting for, funds received under this title; and

(10) procedures for the preparation and submission of an annual report to the Governor which shall include— Report.

(A) a description of activities conducted during the program year;

(B) characteristics of participants; and

(C) the extent to which the activities exceeded or failed to meet relevant performance standards.

(c) If changes in labor market conditions, funding, or other factors require substantial deviation from an approved job training plan, the private industry council and the appropriate chief elected official or officials (as described in section 103(c)) shall submit a modification of such plan (including modification of the budget under subsection (b)(6)), which shall be subject to review in accordance with section 105.

REVIEW AND APPROVAL OF PLAN

29 USC 1515. Sec. 105. (a)(1) Not less than 120 days before the beginning of the first of the two program years covered by the job training plan—

(A) the proposed plan or summary thereof shall be published; and

(B) such plan shall be made available for review and comment to—

(i) each house of the State legislature for appropriate referral;

(ii) appropriate local educational and other public agencies in the service delivery area; and

(iii) labor organizations in the area which represent employees having the skills in which training is proposed; and

(C) such plan shall be reasonably available to the general public through such means as public hearings and local news facilities.

Publication. Submittal to Governor. (2) The final plan, or a summary thereof, shall be published not later than 80 days before the first of the two program years and shall be submitted to the Governor in accordance with section 103(d)(2). Any modification shall be published not later than 80 days before it is effective and shall be submitted to the Governor in accordance with such section.

(b)(1) The Governor shall approve the job training plan or modification thereof unless he finds that—

(A) corrective measures for deficiencies found in audits or in meeting performance standards from previous years have not been taken or are not acceptably underway;

(B) the entity proposed to administer the program does not have the capacity to administer the funds;

(C) there are inadequate safeguards for the protection of funds received;

(D) the plan (or modification) does not comply with a particular provision or provisions of this Act or of regulations of the Secretary under this Act; or

(E) the plan (or modification) does not comply with the criteria under section 121(b) for coordinating activities under this Act with related program activities.

(2) The Governor shall approve or disapprove a job training plan (or modification) within 30 days after the date that the plan (or modification) is submitted, except that if a petition is filed under paragraph (3) such period shall be extended to 45 days. Appeal. Any disapproval by the Governor may be appealed to the Secretary, who shall

make a final decision of whether the Governor's disapproval complies with paragraph (1) of this subsection within 45 days after receipt of the appeal.

Petition.

(3)(A) Interested parties may petition the Governor within 15 days of the date of submission for disapproval of the plan or modification thereof if—

(i) the party can demonstrate that it represents a substantial client interest,

(ii) the party took appropriate steps to present its views and seek resolution of disputed issues prior to submission of the plan to the Governor, and

(iii) the request for disapproval is based on a violation of statutory requirements.

Petitioner, notification.

(B) If the Governor approves the plan (or modification), the Governor shall notify the petitioner in writing of such decision and the reasons therefor.

Service delivery areas, redesignation.

(c)(1) If a private industry council and the appropriate chief elected official or officials fail to reach the agreement required under section 103 (b) or (d) and, as a consequence, funds for a service delivery area may not be made available under section 104, then the Governor shall redesignate, without regard to sections 101 (a)(4) and (c)(1), the service delivery areas in the State to merge the affected area into one or more other service delivery areas, in order to promote the reaching of agreement.

(2) In any State in which service delivery areas are redesignated under paragraph (1), private industry councils shall, to the extent necessary for the redesignation, be reconstituted and job training plans modified as required to comply with sections 102 and 103. Services under an approved plan shall not be suspended while the council is reconstituted and the plan is modified.

Plan submittal.

(d) In any case in which the service delivery area is a State, the plan (or modification) shall be submitted to the Secretary for approval. For the purpose of this subsection, the Secretary shall have the same authority as the Governor has under this section.

PERFORMANCE STANDARDS

29 USC 1516.

SEC. 106. (a) The Congress recognizes that job training is an investment in human capital and not an expense. In order to determine whether that investment has been productive, the Congress finds that—

(1) it is essential that criteria for measuring the return on this investment be developed; and

(2) the basic return on the investment is to be measured by the increased employment and earnings of participants and the reductions in welfare dependency.

Adult training programs.

(b)(1) The basic measure of performance for adult training programs under title II is the increase in employment and earnings and the reductions in welfare dependency resulting from participation in the program. In order to determine whether these basic measures are achieved, the Secretary shall prescribe standards on the basis of appropriate factors which may include (A) placement in unsubsidized employment, (B) retention in unsubsidized employment, (C) the increase in earnings, including hourly wages, and (D) reduction in the number of individuals and families receiving cash welfare payments and the amounts of such payments.

Youth programs.

(2) In prescribing standards under this section the Secretary shall also designate factors for evaluating the performance of youth programs which, in addition to appropriate utilization of the factors described in paragraph (1), shall be (A) attainment of recognized employment competencies recognized by the private industry council, (B) elementary, secondary, and postsecondary school completion, or the equivalent thereof, and (C) enrollment in other training programs or apprenticeships, or enlistment in the Armed Forces.

(3) The standards shall include provisions governing—

(A) the base period prior to program participation that will be used;

(B) a representative period after termination from the program that is a reasonable indicator of postprogram earnings and cash welfare payment reductions; and

(C) cost-effective methods for obtaining such data as is necessary to carry out this section, which, notwithstanding any other provision of law, may include access to earnings records, State employment security records, Federal Insurance Contributions Act records, State aid to families with dependent children records, statistical sampling techniques, and similar records or measures.

(4) The Secretary shall prescribe performance standards relating gross program expenditures to various performance measures.

Post, p. 1357.

(c) Within six months after the date of the enactment of this Act, the Secretary shall establish initial performance standards which are designed to contribute to the achievement of the performance goals set forth in subsection (b)(1), based upon data accumulated under the Comprehensive Employment and Training Act, from the National Commission for Employment Policy, and from other appropriate sources. In the development of the initial standards under this subsection, the Secretary shall relate gross program expenditures to the accomplishment of program goals set forth in subsection (b)(1).

(d)(1) The Secretary shall, not later than January 31, 1984, prescribe performance standards for the first program year under this Act to measure the results of the participation in the program to achieve the goals set forth in subsection (b)(1) based upon the initial standards established in subsection (c).

Report to Congress.

(2) The Secretary, not later than six months after the completion of the first two program years, shall prepare and submit a report to the Congress containing the performance standards established under paragraph (1) of this subsection, together with an analysis of the manner in which the performance standards contribute to the achievement of the goals set forth in subsection (b)(1), including the relative importance of each standard to the accomplishment of such goals.

(3) The Secretary shall prescribe variations in performance standards for special populations to be served, including Native Americans, migrant and seasonal farmworkers, and ex-offenders, taking into account their special circumstances.

Modification.

(4)(A) The Secretary may modify the performance standards under this subsection not more often than once every two program years and such modifications shall not be retroactive.

Report to Congress.

(B) The Secretary shall prepare and submit a report to the Congress containing any modifications established under subparagraph (A), and the reasons for such modifications.

Variations of standards.

(e) Each Governor may prescribe, within parameters established by the Secretary, variations in the standards under this subsection based upon specific economic, geographic, and demographic factors in the State and in service delivery areas within the State, the characteristics of the population to be served, and the type of services to be provided.

Development of standards.

(f) The National Commission for Employment Policy shall (1) advise the Secretary in the development of performance standards under this section for measuring results of participation in job training and in the development of parameters for variations of such standards referred to in subsection (e), (2) evaluate the usefulness of such standards as measures of desired performance, and (3) evaluate the impacts of such standards (intended or otherwise) on the choice of who is served, what services are provided, and the cost of such services in service delivery areas.

Post, p. 1364.

(g) The Secretary shall prescribe performance standards for programs under title III based on placement and retention in unsubsidized employment.

Reorganizaiton plan.

(h)(1) The Governor shall provide technical assistance to programs which do not meet performance criteria. If the failure to meet performance standards persists for a second year, the Governor shall impose a reorganization plan. Such plan may restructure the private industry council, prohibit the use of designated service providers or make such other changes as the Governor deems necessary to improve performance. The Governor may also select an alternate entity to administer the program for the service delivery area.

(2) The alternate administrative entity may be a newly formed private industry council or any agency jointly selected by the Governor and the chief elected official of the largest unit of general local government in the service delivery area.

(3) No change may be made under this subsection without an opportunity for a hearing before a hearing officer.

Appeal.

(4) The decision of the Governor may be appealed to the Secretary, who shall make a final decision within 60 days of the receipt of the appeal.

SELECTION OF SERVICE PROVIDERS

29 USC 1517.

Sec. 107. (a) The primary consideration in selecting agencies or organizations to deliver services within a service delivery area shall be the effectiveness of the agency or organization in delivering comparable or related services based on demonstrated performance, in terms of the likelihood of meeting performance goals, cost, quality of training, and characteristics of participants. In complying with this subsection, proper consideration shall be given to community-based organizations as service providers.

Restrictions.

(b) Funds provided under this Act shall not be used to duplicate facilities or services available in the area (with or without reimbursement) from Federal, State, or local sources, unless it is demonstrated that alternative services or facilities would be more effective or more likely to achieve the service delivery area's performance goals.

Educational services.

(c) Appropriate education agencies in the service delivery area shall be provided the opportunity to provide educational services, unless the administrative entity demonstrates that alternative agencies or organizations would be more effective or would have greater potential to enhance the participants' continued occupational and career growth.

(d) The administrative entity shall not fund any occupational skills training program unless the level of skills provided in the program are in accordance with guidelines established by the private industry council.

LIMITATION ON CERTAIN COSTS

29 USC 1518.

Post, p. 1358.

SEC. 108. (a) Not more than 15 percent of the funds available to a service delivery area for any fiscal year for programs under part A of title II may be expended for the cost of administration. For purposes of this paragraph, costs of program support (such as counseling) which are directly related to the provision of education or training and such additional costs as may be attributable to the development of training described in section 204(28) shall not be counted as part of the cost of administration.

(b)(1) Not more than 30 percent of the funds available to a service delivery area for any fiscal year for programs under part A of title II may be expended for administrative costs (as defined under subsection (a)) and costs specified in paragraph (2).

(2)(A) For purposes of paragraph (1), the costs specified in this paragraph are—

(i) 50 percent of any work experience expenditures which meet the requirements of paragraph (3);

(ii) 100 percent of the cost of any work experience program expenditures which do not meet the requirements of paragraph (3);

(iii) supportive services; and

(iv) needs-based projects described in section 204(27).

(B) For purposes of paragraph (1), the costs specified in this paragraph do not include expenditures for tryout employment which meets the requirements of section 205(d)(3)(B).

Work experience expenditure.

(3) For purposes of paragraph (2), a work experience expenditure meets the requirements of this paragraph if—

(A) the work experience is of not more than 6 months' duration and is combined with a classroom or other training program;

(B) an individual participant is prohibited from participating in any other work experience program following participation in a program meeting the requirements of this paragraph;

(C) the classroom or other training program component is specified in a preemployment contract or meets established academic standards; and

(D) wages paid in the work experience program do not exceed the prevailing entry-level wage for the same occupation in the same labor market area.

(c)(1) Notwithstanding subsection (b), expenditures may be made in excess of the limitation contained in such subsection if such expenditures are made in accordance with the requirements of this subsection.

(2) Expenditures may be made in excess of the limitation contained in subsection (b) in any service delivery area if—

(A) the private industry council for such area initiates a request for such excess costs; and

(B) excess costs are due to one or more of the following conditions in such area:

(i) an unemployment rate (in the service delivery area or that portion within which services resulting in excess costs are to be provided) which exceeds the national average unemployment rate by at least 3 percentage points, and the ratio of current private employment to population in such area or portion is less than the national average of such ratio;

(ii) the job training plan for such area proposes to serve a disproportionately high number of participants from groups requiring exceptional supportive service costs, such as handicapped individuals, offenders, and single heads of households with dependent children;

(iii) the cost of providing necessary child care exceeds one-half of the costs specified in paragraph (2) of subsection (b);

(iv) the costs of providing necessary transportation exceeds one-third of the costs specified in paragraph (2) of subsection (b); or

(v) a substantial portion of the participants in programs in the service delivery area are in training programs of 9 months' duration or more.

(3) Expenditures may be made in excess of the limitation contained in subsection (b) if the need for and the amount of the excess is stated in the job training plan (or modification thereof) for the service delivery area and such plan demonstrates that administrative costs comply with subsection (a) of this section.

(4) The provisions of this subsection shall not be available to the extent that supportive services provided under the job training plan duplicate services provided by any other public or private source that are available to participants without cost.

Plan disapproval.

(5) The Governor shall not disapprove any plan (or modification thereof) on the basis of any statement of the need for and amount of excess costs in the job training plan if such plan or modification meets the requirements of this subsection.

(d) The provisions of this section do not apply to any service delivery area designated pursuant to section 101(a)(4)(A)(iii).

(e) This section shall not be construed to exempt programs under an approved plan from the performance standards established under section 106.

PART B—ADDITIONAL STATE RESPONSIBILITIES

GOVERNOR'S COORDINATION AND SPECIAL SERVICES PLAN

Annual statement. 29 USC 1531.

SEC. 121. (a)(1) The Governor shall annually prepare a statement of goals and objectives for job training and placement programs within the State to assist in the preparation of the plans required under section 104 of this Act and section 8 of the Act of June 6, 1933 (known as the Wagner-Peyser Act).

29 USC 49g.

(2) Any State seeking financial assistance under this Act shall submit a Governor's coordination and special services plan for two program years to the Secretary describing the use of all resources provided to the State and its service delivery areas under this Act and evaluating the experience over the preceding two years.

Post, p. 1364.

(b)(1) The plan shall establish criteria for coordinating activities under this Act (including title III) with programs and services provided by State and local education and training agencies (including vocational education agencies), public assistance agencies, the employment service, rehabilitation agencies, postsecondary institutions, economic development agencies, and such other agencies as the Governor determines to have a direct interest in employment and training and human resource utilization within the State. Such criteria shall not affect local discretion concerning the selection of eligible participants or service providers in accordance with the provisions of sections 107 and 203.

(2) The plan shall describe the projected use of resources, including oversight and support activities, priorities and criteria for State incentive grants, and performance goals for State supported programs.

Report to Secretary. (3) The Governor shall report to the Secretary the adjustments made in the performance standards and the factors that are used in making the adjustments.

Modification. (4) If major changes occur in labor market conditions, funding, or other factors during the two-year period covered by the plan, the State shall submit a modification to the Secretary describing these changes.

(c) Governor's coordination and special services activities may include—

(1) making available to service delivery areas, with or without reimbursement and upon request, appropriate information and technical assistance to assist in developing and implementing plans and programs;

(2) carrying out special model training and employment programs and related services (including programs receiving financial assistance from private sources);

(3) providing programs and related services for offenders and other individuals whom the Governor determines require special assistance;

(4) providing financial assistance for special programs and services designed to meet the needs of rural areas outside major labor market areas;

(5) providing training opportunities in the conservation and efficient use of energy, and the development of solar energy sources as defined in section 3 of the Solar Energy Research, Development and Demonstration Act of 1974; 42 USC 5552.

(6) industry-wide training;

Post, p. 1364. (7) activities under title III of this Act;

(8) developing and providing to service delivery areas information on a State and local area basis regarding economic, industrial, and labor market conditions;

(9) providing preservice and inservice training for planning, management, and delivery staffs of administrative entities and private industry councils, as well as contractors for State supported programs; and

(10) providing statewide programs which provide for joint funding of activities under this Act with services and activities under other Federal, State, or local employment-related programs.

(d) A Governor's coordination and special services plan shall be approved by the Secretary unless the Secretary determines that the plan does not comply with specific provisions of this Act.

STATE JOB TRAINING COORDINATING COUNCIL

29 USC 1532.

SEC. 122. (a)(1) Any State which desires to receive financial assistance under this Act shall establish a State job training coordinating council (hereinafter in this section referred to as the "State council"). Funding for the council shall be provided pursuant to section 202(b)(4).

(2) The State council shall be appointed by the Governor, who shall designate one nongovernmental member thereof to be chairperson. In making appointments to the State council, the Governor shall ensure that the membership of the State council reasonably represents the population of the State.

Membership.

(3) The State council shall be composed as follows:

(A) One-third of the membership of the State council shall be representatives of business and industry (including agriculture, where appropriate) in the State, including individuals who are representatives of business and industry on private industry councils in the State.

(B) Not less than 20 percent of the membership of the State council shall be representatives of the State legislature and State agencies and organizations, such as the State educational agency, the State vocational education board, the State advisory council on vocational education, the State board of education (when not otherwise represented), State public assistance agencies, the State employment security agency, the State rehabilitation agency, the State occupational information coordinating committee, State postsecondary institutions, the State economic development agency, State veterans' affairs agencies or equivalent, and such other agencies as the Governor determines to have a direct interest in employment and training and human resource utilization within the State.

(C) Not less than 20 percent of the membership of the State council shall be representatives of the units or consortia of units of general local government in such State (including those which are administrative entities or grantees under this Act) which shall be nominated by the chief executive officers of the units or consortia of units of general local government; and

(D) Not less than 20 percent of the membership of the State council shall be representatives of the eligible population and of the general public, representatives of organized labor, representatives of community-based organizations, and representatives of local educational agencies (nominated by local educational agencies).

Meetings.

(4) The State council shall meet at such times and in such places as it deems necessary. The meetings shall be publicly announced, and, to the extent appropriate, open and accessible to the general public.

(5) The State council is authorized to obtain the services of such professional, technical, and clerical personnel as may be necessary to carry out its functions under this Act.

(6) In order to assure objective management and oversight, the State council shall not operate programs or provide services directly to eligible participants, but shall exist solely to plan, coordinate, and monitor the provision of such programs and services.

Approval.

(7) The plans and decisions of the State council shall be subject to approval by the Governor.

20 USC 2305

(8) For purposes of section 105 of the Vocational Education Act of 1963, the State council shall be considered to be the same as either the State Manpower Services Council referred to in that section or the State Employment and Training Council authorized under the Comprehensive Employment and Training Act.

Post, p. 1357.

(b) The State council shall—

(1) recommend a Governor's coordination and special services plan;

(2) recommend to the Governor substate service delivery areas, plan resource allocations not subject to section 202(a), provide management guidance and review for all programs in the State, develop appropriate linkages with other programs, coordinate activities with private industry councils, and develop the Governor's coordination and special services plan and recommend variations in performance standards;

(3) advise the Governor and local entities on job training plans and certify the consistency of such plans with criteria under the Governor's coordination and special services plan for coordination of activities under this Act with other Federal, State, and local employment-related programs, including programs operated in designated enterprise zones;

(4) review the operation of programs conducted in each service delivery area, and the availability, responsiveness, and adequacy of State services, and make recommendations to the Governor, appropriate chief elected officials, and private industry councils, service providers, the State legislature, and the general public with respect to ways to improve the effectiveness of such programs or services;

(5) review and comment on the State plan developed for the State employment service agency;

Report.

(6) make an annual report to the Governor which shall be a public document, and issue such other studies, reports, or documents as it deems advisable to assist service delivery areas in carrying out the purposes of this Act;

(7)(A) identify, in coordination with the appropriate State agencies, the employment and training and vocational education needs throughout the State, and assess the extent to which employment and training, vocational education, rehabilitation services, public assistance, economic development, and other Federal, State, and local programs and services represent a consistent, integrated, and coordinated approach to meeting such needs; and

Comments.

20 USC 2305.

(B) comment at least once annually on the reports required pursuant to section 105(d)(3) of the Vocational Education Act of 1963; and

(8) review plans of all State agencies providing employment, training, and related services, and provide comments and recommendations to the Governor, the State legislature, the State agencies, and the appropriate Federal agencies on the relevancy and effectiveness of employment and training and related service delivery systems in the State.

Transfer of functions.

(c) In addition to the functions described in subsection (b), the Governor may, to the extent permitted by applicable law, transfer functions which are related to functions under this Act to the council established under this section from any State coordinating committee for the work incentive program under title IV of the

Social Security Act or any advisory council established under the Wagner-Peyser Act.

42 USC 601.
29 USC 49 note.

STATE EDUCATION COORDINATION AND GRANTS

29 USC 1533.

SEC. 123. (a) The sums available for this section pursuant to section 202(b)(1) shall be used by the Governor to provide financial assistance to any State education agency responsible for education and training—

(1) to provide services for eligible participants through cooperative agreements between such State education agency or agencies, administrative entities in service delivery areas in the State, and (where appropriate) local educational agencies; and

(2) to facilitate coordination of education and training services for eligible participants through such cooperative agreements.

(b) The cooperative agreements described in subsection (a) shall provide for the contribution by the State agency or agencies, and the local educational agency (if any), of a total amount equal to the amount provided, pursuant to subsection (a)(1), in the grant subject to such agreement. Such matching amount shall not be provided from funds available under this Act, but may include the direct cost of employment or training services provided by State or local programs.

Funds.
Post, p. 1358.

(c)(1) Funds available under this section may be used to provide education and training, including vocational education services, and related services to participants under title II. Such services may include services for offenders and other individuals whom the Governor determines require special assistance.

(2)(A) Not more than 20 percent of the funds available under this section may be spent for activities described in clause (2) of subsection (a).

(B) At least 80 percent of the funds available under this section shall be used for clause (1) of subsection (a) for the Federal share of the cost of carrying out activities described in clause (1). For the purpose of this subparagraph, the Federal share shall be the amount provided for in the cooperative agreements in subsection (b).

(3) Not less than 75 percent of the funds available for activities under clause (1) of subsection (a) shall be expended for activities for economically disadvantaged individuals.

(d) If no cooperative agreement is reached on the use of funds under this section, the funds shall be available to the Governor for use in accordance with section 121.

TRAINING PROGRAMS FOR OLDER INDIVIDUALS

29 USC 1534.

SEC. 124. (a) From funds available for use under section 202(b)(2), the Governor is authorized to provide for job training programs which are developed in conjunction with service delivery areas within the State and which are consistent with the plan for the service delivery area prepared and submitted in accordance with the provisions in section 104, and designed to assure the training and placement of older individuals in employment opportunities with private business concerns.

(b) In carrying out this section, the Governor shall, after consultation with appropriate private industry councils and chief elected officials, enter into agreements with public agencies, nonprofit private organizations, and private business concerns.

(c) The Governor shall give consideration to assisting programs involving training for jobs in growth industries and jobs reflecting the use of new technological skills.

Eligibility requirement. (d) An individual shall be eligible to participate in a job training program under this section only if the individual is economically disadvantaged and has attained 55 years of age.

STATE LABOR MARKET INFORMATION PROGRAMS

29 USC 1535. SEC. 125. (a) In order to be eligible for Federal financial assistance for State labor market information programs under this Act from funds made available under section 202(b)(4) and section 461(b), the Governor shall designate the State occupational information coordinating committee or other organizational unit to be responsible for oversight and management of a statewide comprehensive labor market and occupational supply and demand information system, which shall—

(1) design a comprehensive cost-efficient labor market and occupational supply and demand information system which—

(A) is responsive to the economic demand and education and training supply support needs of the State and areas within the State, and

44 USC 3501. (B) meets the Federal standards under chapter 35 of title 44, United States Code, and other appropriate Federal standards established by the Bureau of Labor Statistics;

(2) standardize available Federal and State multi-agency administrative records and direct survey data sources to produce an employment and economic analysis with a published set of projections for the State and designated areas within the State which, at the minimum, includes—

(A) identification of geographic and occupational areas of potential growth or decline; and

(B) an assessment of the potential impact of such growth or decline on individuals, industries, and communities, including occupational supply and demand characteristics data;

(3) assure, to the extent feasible, that—

(A) automated technology will be used by the State;

(B) administrative records have been designed to reduce paperwork; and

(C) multiple survey burdens on the employers of the State have been reduced;

(4) publish and disseminate labor market and occupational supply and demand information and individualized career information to State agencies, area public agencies, libraries, and private not-for-profit users, and individuals who are in the process of making career decision choices; and

(5) conduct research and demonstration projects designed to improve any aspect of the statewide information system.

(b)(1) The analysis required under clause (2) of subsection (a) shall be used to contribute in carrying out the provisions of this Act, the Vocational Education Act of 1963, and the Act of June 6, 1933, known as the Wagner-Peyser Act. 20 USC 2301 note. 29 USC 49 note.

(2) The assurance required by clause (3) of subsection (a) shall also include that the State will, to the maximum extent possible, assure consolidation of available administrative data and surveys to reduce duplication of recordkeeping of State and local agencies, including secondary and postsecondary educational institutions.

(3) If any Federal funds are used to carry out clause (5) of subsection (a), access to and information on the results will remain in the public domain.

Reimbursement.

(c) The Secretary through the National Occupational Information Coordinating Committee shall reimburse the States the costs of carrying out the provisions of this section but the aggregate reimbursements in any fiscal year shall not exceed the amount available under part E of title IV for this subsection.

Post, p. 1383.

Notice.

(d) No provision of this part or any other provision of Federal law shall be construed to prohibit any State from combining or consolidating Federal administrative management information reporting requirements relating to employment, productivity, or training, if notice is transmitted by the Governor to the head of each appropriate Federal and State agency responsible for the laws governing the Federal reporting requirements. The notice shall specify the intent to combine or consolidate such requirements. The head of each appropriate Federal agency shall approve the combination or consolidation unless, within sixty days after receiving the notice, the Federal agency can demonstrate that the combination or consolidation will not meet the essential purposes of the affected Federal law.

AUTHORITY OF STATE LEGISLATURE

29 USC 1536.

Sec. 126. Nothing in this Act shall be interpreted to preclude the enactment of State legislation providing for the implementation, consistent with the provisions of this Act, of the programs assisted under this Act.

INTERSTATE AGREEMENTS

29 USC 1537.

Sec. 127. In the event that compliance with provisions of this Act would be enhanced by cooperative agreements between States, the consent of Congress is hereby given to such States to enter into such compacts and agreements to facilitate such compliance, subject to the approval of the Secretary.

Part C—Program Requirements for Service Delivery System

GENERAL PROGRAM REQUIREMENTS

29 USC 1551.

Sec. 141. Except as otherwise provided, the following conditions are applicable to all programs under this Act:

(a) Each job training plan shall provide employment and training opportunities to those who can benefit from, and who are most in need of, such opportunities and shall make efforts to provide equitable services among substantial segments of the eligible population.

(b) Funds provided under this Act shall only be used for activities which are in addition to those which would otherwise be available in the area in the absence of such funds.

Restrictions.

(c) No funds may be used to assist in relocating establishments, or parts thereof, from one area to another unless such relocation will not result in an increase in unemployment in the area of original location or in any other area.

(d)(1) Training provided with funds made available under this Act shall be only for occupations for which there is a demand in the area served or in another area to which the participant is willing to relocate, and consideration in the selection of training programs may be given to training in occupations determined to be in sectors of the economy which have a high potential for sustained demand or growth.

(2) Efforts shall be made to develop programs which contribute to occupational development, upward mobility, development of new careers, and overcoming sex-stereotyping in occupations traditional for the other sex.

(3) Commercially available training packages, including advanced learning technology, may be purchased for off-the-shelf prices and without requiring a breakdown of the cost components of the package if such packages are purchased competitively and include performance criteria.

Post, p. 1358.

(e) Only eligible individuals residing in the service delivery area may be served by employment and training activities funded under title II, except that the job training plan may provide for limited exceptions to this requirement.

Voting.

(f) No member of any council under this Act shall cast a vote on the provision of services by that member (or any organization which that member directly represents) or vote on any matter which would provide direct financial benefit to that member.

(g) Payments to employers for on-the-job training which shall not, during the period of such training, average more than 50 percent of the wages paid by the employer to such participants, and payments in such amount shall be deemed to be in compensation for the extraordinary costs associated with training participants under this title and in compensation for the costs associated with the lower productivity of such participants.

Restriction.

(h) Funds provided under this Act shall not be used to duplicate facilities or services available in the area (with or without reimbursement) from Federal, State, or local sources, unless the plan establishes that alternative services or facilities would be more effective or more likely to achieve performance goals.

Fund, allocation.

(i) Each administrative entity shall be responsible for the allocation of funds and the eligibility of those enrolled in its programs and shall have responsibility to take action against its subcontractors, subgrantees, and other recipients to eliminate abuses in the programs they are carrying out, and to prevent any misuse of funds by such subcontractors, subgrantees, and other recipients. Administrative entities may delegate the responsibility for determination of eligibility under reasonable safeguards, including provisions for reimbursement of cost incurred because of erroneous determinations made with insufficient care, if such an arrangement is included in an approved job training plan.

Fee.

(j) No person or organization may charge an individual a fee for the placement or referral of such individual in or to a training program under this Act.

Restriction.

(k) No funds may be provided under this Act for any subsidized employment with any private for-profit employer unless the individual employed is a youth aged 16 to 21, inclusive, who is economically disadvantaged and the employment is provided in accordance with section 205(d)(3)(B).

(l) The Secretary shall not provide financial assistance for any program under this Act which involves political activities.

(m) Pursuant to regulations of the Secretary, income generated under any program may be retained by the recipient to continue to carry out the program, notwithstanding the expiration of financial assistance for that program.

(n) The Secretary shall notify the Governor and the appropriate private industry councils and chief elected officials of, and consult with the Governor and such councils and officials concerning, any activity to be funded by the Secretary under this Act within the State or service delivery area; and the Governor shall notify the appropriate private industry councils and chief elected officials of, and consult with such concerning, any activity to be funded by the Governor under this Act within the service delivery area.

(o)(1) All education programs for youth supported with funds provided under title II shall be consistent with applicable State and local educational standards.

Post, p. 1358.

(2) Standards and procedures with respect to the awarding of academic credit and certifying educational attainment in programs conducted under such title shall be consistent with the requirements of applicable State and local law and regulation.

(p) No funds available under part B of this title or part A of title II may be used for public service employment.

BENEFITS

Wages and earnings.
29 USC 1552.

Sec. 142. (a) Except as otherwise provided in this Act, the following provisions shall apply to all activities financed under this Act:

(1) A trainee shall receive no payments for training activities in which the trainee fails to participate without good cause.

(2) Individuals in on-the-job training shall be compensated by the employer at the same rates, including periodic increases, as similarly situated employees or trainees and in accordance with applicable law, but in no event less than the higher of the rate specified in section 6(a)(1) of the Fair Labor Standards Act of 1938 or the applicable State or local minimum wage law.

29 USC 206.

(3) Individuals employed in activities authorized under this Act shall be paid wages which shall not be less than the highest of (A) the minimum wage under section 6(a)(1) of the Fair Labor Standards Act of 1938, (B) the minimum wage under the applicable State or local minimum wage law, or (C) the prevailing rates of pay for individuals employed in similar occupations by the same employer.

(b) Allowances, earnings and payments to individuals participating in programs under this Act shall not be considered as income for the purposes of determining eligibility for and the amount of income transfer and in-kind aid, other than programs under the Social Security Act.

42 USC 1305.

LABOR STANDARDS

29 USC 1553.

Sec. 143. (a)(1) Conditions of employment and training shall be appropriate and reasonable in light of such factors as the type of work, geographical region, and proficiency of the participant.

(2) Health and safety standards established under State and Federal law, otherwise applicable to working conditions of employees, shall be equally applicable to working conditions of participants. With respect to any participant in a program conducted under this Act who is engaged in activities which are not covered by health and safety standards under the Occupational Safety and Health Act of 1970, the Secretary shall prescribe, by regulation, such standards as may be necessary to protect the health and safety of such participants.

Regulation.
29 USC 651 note.

Workers' compensation.

(3) To the extent that a State workers' compensation law is applicable, workers' compensation benefits in accordance with such law shall be available with respect to injuries suffered by participants. To the extent that such law is not applicable, each recipient of funds under this Act shall secure insurance coverage for injuries suffered by such participants, in accordance with regulations prescribed by the Secretary.

(4) All individuals employed in subsidized jobs shall be provided benefits and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work.

Restriction.

(5) No funds available under this Act may be used for contributions on behalf of any participant to retirement systems or plans.

(b)(1) No currently employed worker shall be displaced by any participant (including partial displacement such as a reduction in the hours of nonovertime work, wages, or employment benefits).

(2) No program shall impair existing contracts for services or collective bargaining agreements, except that no program under this Act which would be inconsistent with the terms of a collective bargaining agreement shall be undertaken without the written concurrence of the labor organization and employer concerned.

Job vacancy.

(3) No participant shall be employed or job opening filled (A) when any other individual is on layoff from the same or any substantially equivalent job, or (B) when the employer has terminated the employment of any regular employee or otherwise reduced its workforce with the intention of filling the vacancy so created by hiring a participant whose wages are subsidized under this Act.

(4) No jobs shall be created in a promotional line that will infringe in any way upon the promotional opportunities of currently employed individuals.

(c)(1) Each recipient of funds under this Act shall provide to the Secretary assurances that none of such funds will be used to assist, promote, or deter union organizing.

Comments.

(2) Where a labor organization represents a substantial number of employees who are engaged in similar work or training in the same area as that proposed to be funded under this Act, an opportunity shall be provided for such organization to submit comments with respect to such proposal.

(d) All laborers and mechanics employed by contractors or subcontractors in any construction, alteration, or repair, including painting and decorating, of projects, buildings, and works which are federally assisted under this Act, shall be paid wages at rates not less than those prevailing on similar construction in the locality as determined by the Secretary in accordance with the Act of March 3, 1921 (40 U.S.C. 276a–276a–5), popularly known as the Davis-Bacon Act. The Secretary shall have, with respect to such labor standards, the authority and functions set forth in Reorganization Plan Numbered 14 of 1950 (15 F.R. 3176; 64 Stat. 1267) and section 2 of the Act of June 1, 1934, as amended (48 Stat. 948, as amended; 40 U.S.C. 276(c)). The provisions of this subsection shall not apply to a bona fide trainee in a training program under this Act. The provisions of section 167(a)(4) shall apply to such trainees.

40 USC 276c.

GRIEVANCE PROCEDURE

29 USC 1554.

SEC. 144. (a) Each administrative entity, contractor, and grantee under this Act shall establish and maintain a grievance procedure for grievances or complaints about its programs and activities from participants, subgrantees, subcontractors, and other interested persons. Hearings on any grievance shall be conducted within 30 days of filing of a grievance and decisions shall be made not later than 60 days after the filing of a grievance. Except for complaints alleging fraud or criminal activity, complaints shall be made within one year of the alleged occurrence.

Hearings.

(b) Each recipient of financial assistance under this Act which is an employer of participants under this Act shall continue to operate or establish and maintain a grievance procedure relating to the terms and conditions of employment.

Investigation.

(c) Upon exhaustion of a recipient's grievance procedure without decision, or where the Secretary has reason to believe that the recipient is failing to comply with the requirements of this Act or the terms of the job training plan, the Secretary shall investigate the allegation or belief and determine within 120 days after receiving the complaint whether such allegation or complaint is true.

PROHIBITION AGAINST FEDERAL CONTROL OF EDUCATION

29 USC 1555.

SEC. 145. No provision of this Act shall be construed to authorize any department, agency, officer, or employee of the United States to exercise any direction, supervision, or control over the curriculum, program of instruction, administration, or personnel of any educational institution, school, or school system, or over the selection of library resources, textbooks, or other printed or published instructional materials by any educational institution or school system.

PART D—FEDERAL AND FISCAL ADMINISTRATIVE PROVISIONS

PROGRAM YEAR

29 USC 1571.

SEC. 161. (a) Beginning with fiscal year 1985 and thereafter, appropriations for any fiscal year for programs and activities under this Act shall be available for obligation only on the basis of a program year. The program year shall begin on July 1 in the fiscal year for which the appropriation is made.

(b) Funds obligated for any program year may be expended by each recipient during that program year and the two succeeding program years and no amount shall be deobligated on account of a rate of expenditure which is consistent with the job training plan.

(c)(1) Appropriations for fiscal year 1984 shall be available both to fund activities for the period between October 1, 1983, and July 1, 1984, and for the program year beginning July 1, 1984.

Appropriation authorization.

(2) There are authorized to be appropriated such additional sums as may be necessary to carry out the provisions of this subsection for the transition to program year funding.

PROMPT ALLOCATION OF FUNDS

29 USC 1572.

SEC. 162. (a) All allotments and allocations under this Act shall be based on the latest available data and estimates satisfactory to the Secretary. All data relating to economically disadvantaged and low-income persons shall be based on 1980 Census or later data.

Publication in Federal Register.

(b) Whenever the Secretary allots and allocates funds required to be allotted or allocated by formula under this Act, the Secretary shall publish in a timely fashion in the Federal Register the proposed amount to be distributed to each recipient.

Funds, distribution.

(c) All funds required to be distributed by formula under this Act shall be allotted within 45 days after enactment of the appropriations, except that, if such funds are appropriated in advance as authorized by section 161, such funds shall be allotted not later than the March 31 preceding the program year for which such funds are to be available for obligation.

Publication in Federal Register.

(d) Whenever the Secretary utilizes a formula to allot or allocate funds made available for distribution at the Secretary's discretion under this Act, the Secretary shall, not later than 30 days prior to such allotment or allocation, publish such formula in the Federal Register for comments along with the rationale for the formula and the proposed amounts to be distributed to each State and area. After consideration of any comments received, the Secretary shall publish final allotments and allocations in the Federal Register.

(e) Funds shall be made available to the grant recipient for the service delivery area not later than 30 days after the date they are made available to the Governor or 7 days after the date the plan is approved, whichever is later.

MONITORING

29 USC 1573.

Sec. 163. (a) The Secretary is authorized to monitor all recipients of financial assistance under this Act to determine whether they are complying with the provisions of this Act and the regulations issued under this Act.

Investigations.

(b) The Secretary may investigate any matter the Secretary deems necessary to determine compliance with this Act and regulations issued under this Act. The investigations authorized by this subsection may include examining records (including making certified copies thereof), questioning employees, and entering any premises or onto any site in which any part of a program of a recipient is conducted or in which any of the records of the recipient are kept.

(c) For the purpose of any investigation or hearing under this Act, the provisions of section 9 of the Federal Trade Commission Act (15 U.S.C. 49) (relating to the attendance of witnesses and the production of books, papers, and documents) are made applicable to the Secretary.

FISCAL CONTROLS; SANCTIONS

Audits.
29 USC 1574.

Post, pp. 1358, 1364.

Sec. 164. (a)(1) Each State shall establish such fiscal control and fund accounting procedures as may be necessary to assure the proper disbursal of, and accounting for, Federal funds paid to the recipient under titles II and III. The Director of the Office of Management and Budget, in consultation with the Comptroller General of the United States, shall establish guidance for the proper performance of audits. Such guidance shall include a review of fiscal controls and fund accounting procedures established by States under this section.

(2) At least once every two years, the State shall prepare or have prepared an independent financial and compliance audit of each recipient of funds under titles II and III of this Act. Under criteria established by the Director of the Office of Management and Budget, and upon application by the Governor, the Secretary may exempt designated recipients from all or part of the requirements of this

section, except that any such exemption shall not apply to the State administering agency, the entity which is the administrative entity for the job training plan for a service delivery area, or a private industry council. Any exemption under this section may be withdrawn by the Secretary in consultation with the Director of the Office of Management and Budget.

(3) Each audit shall be conducted in accordance with applicable auditing standards set forth in the financial and compliance element of the Standards for Audit of Governmental Organizations, Programs, Activities, and Functions issued by the Comptroller General of the United States.

Notice of intent.

(b)(1) Whenever, as a result of financial and compliance audits or otherwise, the Governor determines that there is a substantial violation of a specific provision of this Act or the regulations, and corrective action has not been taken, the Governor may issue a notice of intent to revoke approval of all or part of the plan affected. Such notice may be appealed to the Secretary under the same terms and conditions as the disapproval of the plan and shall not become effective until (A) the time for appeal has expired or (B) the Secretary has issued a decision.

(2) The Governor shall withdraw the notice if the appropriate corrective action has been taken.

(c)(1) The Comptroller General of the United States shall, on a selective basis, evaluate the expenditures by the recipients of grants under this Act in order to assure that expenditures are consistent with the provisions of this Act and to determine the effectiveness of each recipient in accomplishing the purposes of this Act. The Comptroller General shall conduct the evaluations whenever he determines it necessary and he shall periodically report to the Congress on the findings of such evaluations.

(2) Nothing in this Act shall be deemed to relieve the Inspector General of the Department of Labor of his responsibilities under the Inspector General Act.

Information, disclosure.

(3) For the purpose of evaluating and reviewing programs established or provided for by this Act, the Comptroller General shall have access to and the right to copy any books, accounts, records, correspondence, or other documents pertinent to such programs that are in the possession, custody, or control of the State, a private industry council established under section 102 of this Act, any recipient of funds under this Act, or any subgrantee or contractor of such recipients.

Repayment of funds.

(d) Every recipient shall repay to the United States amounts found not to have been expended in accordance with this Act. The Secretary may offset such amounts against any other amount to which the recipient is or may be entitled under this Act unless he determines that such recipient should be held liable pursuant to subsection (e). No such action shall be taken except after notice and opportunity for a hearing have been given to the recipient.

Notice and hearing.

(e)(1) Each recipient shall be liable to repay such amounts, from funds other than funds received under this Act, upon a determination that the misexpenditure of funds was due to willful disregard of the requirements of this Act, gross negligence, or failure to observe accepted standards of administration. No such finding shall be made except after notice and opportunity for a fair hearing.

Violations.

(2) In determining whether to impose any sanction authorized by this section against a recipient for violations by a subgrantee of such recipient under this Act or the regulations under this Act, the

Secretary shall first determine whether such recipient has adequately demonstrated that it has—

(A) established and adhered to an appropriate system for the award and monitoring of contracts with subgrantees which contains acceptable standards for ensuring accountability;

(B) entered into a written contract with such subgrantee which established clear goals and obligations in unambiguous terms;

(C) acted with due diligence to monitor the implementation of the subgrantee contract, including the carrying out of the appropriate monitoring activities (including audits) at reasonable intervals; and

(D) taken prompt and appropriate corrective action upon becoming aware of any evidence of a violation of this Act or the regulations under this Act by such subgrantee.

(3) If the Secretary determines that the recipient has demonstrated substantial compliance with the requirements of paragraph (2), the Secretary may waive the imposition of sanctions authorized by this section upon such recipient. The Secretary is authorized to impose any sanction consistent with the provisions of this Act and any applicable Federal or State law directly against any subgrantee for violation of this Act or the regulations under this Act.

Financial assistance, termination. Notice and hearing.

(f) In emergency situations, if the Secretary determines it is necessary to protect the integrity of the funds or ensure the proper operation of the program, the Secretary may immediately terminate or suspend financial assistance, in whole or in part, if the recipient is given prompt notice and the opportunity for a subsequent hearing within 30 days after such termination or suspension. The Secretary shall not delegate any of the functions or authority specified in this subsection, other than to an officer whose appointment was required to be made by and with the advice and consent of the Senate.

Discrimination

(g) If the Secretary determines that any recipient under this Act has discharged or in any other manner discriminated against a participant or against any individual in connection with the administration of the program involved, or against any individual because such individual has filed any complaint or instituted or caused to be instituted any proceeding under or related to this Act, or has testified or is about to testify in any such proceeding or investigation under or related to this Act, or otherwise unlawfully denied to any individual a benefit to which that individual is entitled under the provisions of this Act or the Secretary's regulations, the Secretary shall, within thirty days, take such action or order such corrective measures, as necessary, with respect to the recipient or the aggrieved individual, or both.

(h) The remedies under this section shall not be construed to be exclusive remedies.

REPORTS, RECORDKEEPING, AND INVESTIGATIONS

29 USC 1575.

Sec. 165. (a)(1) Recipients shall keep records that are sufficient to permit the preparation of reports required by this Act and to permit the tracing of funds to a level of expenditure adequate to insure that the funds have not been spent unlawfully.

(2) Every recipient shall maintain such records and submit such reports, in such form and containing such information, as the Secretary requires regarding the performance of its programs. Such records and reports shall be submitted to the Secretary but shall not

be required to be submitted more than once each quarter unless specifically requested by the Congress or a committee thereof.

(b)(1)(A) In order to evaluate compliance with the provisions of this Act, the Secretary shall conduct, in several States, in each fiscal year investigations of the use of funds received by recipients under this Act.

Investigations.

(B) In order to insure compliance with the provisions of this Act, the Comptroller General of the United States may conduct investigations of the use of funds received under this Act by any recipient.

(2) In conducting any investigation under this Act, the Secretary or the Comptroller General of the United States may not request the compilation of any new information not readily available to such recipient.

(c) Each State, each administrative entity designated under title I, and each recipient (other than a subrecipient, grantee or contractor of a recipient) receiving funds under this Act shall—

Ante, p. 1327.

(1) make such reports concerning its operations and expenditures as shall be prescribed by the Secretary, and

(2) prescribe and maintain a management information system, in accordance with guidelines prescribed by the Secretary, designed to facilitate the uniform compilation and analysis of programmatic and financial data, on statewide and service delivery area bases, necessary for reporting, monitoring, and evaluating purposes.

ADMINISTRATIVE ADJUDICATION

SEC. 166. (a) Whenever any applicant for financial assistance under this Act is dissatisfied because the Secretary has made a determination not to award financial assistance in whole or in part to such applicant, the applicant may request a hearing before an administrative law judge of the Department of Labor. A similar hearing may also be requested by any recipient upon whom a corrective action or a sanction has been imposed by the Secretary. Except to the extent provided for in section 167, all other disputes arising under this Act shall be adjudicated under grievance procedures established by the recipient or under applicable law other than this Act.

29 USC 1576.

(b) The decision of the administrative law judge shall constitute final action by the Secretary unless, within 20 days after receipt of the decision of the administrative law judge, a party dissatisfied with the decision or any part thereof has filed exceptions with the Secretary specifically identifying the procedure, fact, law, or policy to which exception is taken. Any exception not specifically urged shall be deemed to have been waived. Thereafter the decision of the administrative law judge shall become the final decision of the Secretary unless the Secretary, within 30 days of such filing, has notified the parties that the case has been accepted for review.

Waiver.

(c) Any case accepted for review by the Secretary shall be decided within one hundred and eighty days of such acceptance. If not so decided, the decision of the administrative law judge shall become the final decision of the Secretary.

(d) The provisions of section 168 of this Act shall apply to any final action of the Secretary under this section.

NONDISCRIMINATION

29 USC 1577.

42 USC 6101 note. 29 USC 794. 20 USC 1681. 42 USC 2000d.

SEC. 167. (a)(1) For the purpose of applying the prohibitions against discrimination on the basis of age under the Age Discrimination Act of 1975, on the basis of handicap under section 504 of the Rehabilitation Act, on the basis of sex under title IX of the Education Amendments of 1972, or on the basis of race, color, or national origin under title VI of the Civil Rights Act of 1964, programs and activities funded or otherwise financially assisted in whole or in part under this Act are considered to be programs and activities receiving Federal financial assistance.

(2) No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any such program because of race, color, religion, sex, national origin, age, handicap, or political affiliation or belief.

(3) Participants shall not be employed on the construction, operation, or maintenance of so much of any facility as is used or to be used for sectarian instruction or as a place for religious worship.

(4) With respect to terms and conditions affecting, or rights provided to, individuals who are participants in activities supported by funds provided under this Act, such individuals shall not be discriminated against solely because of their status as such participants.

(5) Participation in programs and activities financially assisted in whole or in part under this Act shall be open to citizens and nationals of the United States, lawfully admitted permanent resident aliens, lawfully admitted refugees and parolees, and other individuals authorized by the Attorney General to work in the United States.

(b) Whenever the Secretary finds that a State or other recipient has failed to comply with a provision of law referred to in subsection (a)(1), with paragraph (2), (3), (4), or (5) of subsection (a), or with an applicable regulation prescribed to carry out such paragraphs, the Secretary shall notify such State or recipient and shall request it to comply. If within a reasonable period of time, not to exceed sixty days, the State or recipient fails or refuses to comply, the Secretary may—

(1) refer the matter to the Attorney General with a recommendation that an appropriate civil action be instituted;

42 USC 2000d, 6101 note; 29 USC 794.

(2) exercise the powers and functions provided by title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, or section 504 of the Rehabilitation Act, as may be applicable; or

(3) take such other action as may be provided by law.

(c) When a matter is referred to the Attorney General pursuant to subsection (b)(1), or whenever the Attorney General has reason to believe that a State or other recipient is engaged in a pattern or practice in violation of a provision of law referred to in subsection (a)(1) or in violation of paragraph (2), (3), (4), or (5) of subsection (a), the Attorney General may bring a civil action in any appropriate district court of the United States for such relief as may be appropriate, including injunctive relief.

(d) For purposes of this section, Job Corps members shall be considered as the ultimate beneficiaries of Federal financial assistance.

961

JUDICIAL REVIEW

SEC. 168. (a)(1) With respect to any final order by the Secretary under section 166 whereby the Secretary determines to award, to not award, or to only conditionally award, financial assistance, with respect to any final order of the Secretary under section 166 with respect to a corrective action or sanction imposed under section 164, and with respect to a denial of an appeal under section 101(4)(C) or 105(b)(2), any party to a proceeding which resulted in such final order may obtain review of such final order in the United States Court of Appeals having jurisdiction over the applicant or recipient of funds, by filing a review petition within 30 days of such final order. 29 USC 1578.

(2) The clerk of the court shall transmit a copy of the review petition to the Secretary who shall file the record upon which the final order was entered as provided in section 2112 of title 28, United States Code. Review petitions unless ordered by the court, shall not stay the Secretary's order. Petitions under this Act shall be heard expeditiously, if possible within ten days of the filing of a reply brief.

(3) No objection to the order of the Secretary shall be considered by the court unless the objection shall have been specifically and timely urged before the Secretary. Review shall be limited to questions of law and the Secretary's findings of fact shall be conclusive if supported by substantial evidence.

(b) The court shall have jurisdiction to make and enter a decree affirming, modifying, or setting aside the order of the Secretary in whole or in part. The court's judgment shall be final, subject to certiorari review by the Supreme Court of the United States as provided in section 1254(1) of title 28, United States Code.

ADMINISTRATIVE PROVISIONS

SEC. 169. (a) The Secretary may, in accordance with chapter 5 of title 5, United States Code, prescribe such rules and regulations (including performance standards) as the Secretary deems necessary. Such rules and regulations may include adjustments authorized by section 204 of the Intergovernmental Cooperation Act of 1968. All such rules and regulations shall be published in the Federal Register at least thirty days prior to their effective date. Copies of all such rules and regulations shall be transmitted to the appropriate committees of the Congress at the same time and shall contain, with respect to each material provision of such rules and regulations, citations to the particular substantive section of law which is the basis therefor.

Rules and regulations.
29 USC 1579.
5 USC 500.

42 USC 4214
Publication in Federal Register.

(b) The Secretary is authorized, in carrying out this Act, to accept, purchase, or lease in the name of the department, and employ or dispose of in furtherance of the purposes of this Act, any money or property, real, personal, or mixed, tangible or intangible, received by gift, devise, bequest, or otherwise, and to accept voluntary and uncompensated services notwithstanding the provisions of section 3679(b) of the Revised Statutes of the United States. 31 USC 665.

(c) The Secretary may make such grants, contracts, or agreements, establish such procedures and make such payments, in installments and in advance or by way of reimbursement, or otherwise allocate or expend funds under this Act as necessary to carry out this Act, including (without regard to the provisions of section 4774(d) of title 10, United States Code) expenditures for construction, repairs, and capital improvements, and including necessary adjustments in payments on account of overpayments or underpayments.

Report to Congress.

(d) The Secretary shall prepare and submit to the Congress an annual report for employment and training programs. The Secretary shall include in such report—

(1) a summary of the achievements, failures, and problems of the programs authorized in this Act in meeting the objective of this Act;

(2) a summary of major findings from research, evaluation, pilot projects, and experiments conducted in the previous fiscal year;

(3) recommendations for program modifications based upon analysis of such findings; and

(4) such other recommendations for legislative or administrative action as the Secretary deems appropriate.

(e) The Secretary shall develop methods to ascertain, and shall ascertain annually, energy development and conservation employment impact data by type and scale of energy technologies used. The Secretary shall present the best available data to the Secretary of Energy, the Secretary of Housing and Urban Development, and the Director of the Office of Management and Budget as part of the budgetary process and to the appropriate Committees of Congress annually.

UTILIZATION OF SERVICES AND FACILITIES

29 USC 1580.

SEC. 170. The Secretary is authorized, in carrying out this Act, and to the extent permitted by law other than this Act, to accept and use the services and facilities of departments, agencies, and establishments of the United States. The Secretary is also authorized to accept and use the services and facilities of the agencies of any State or political subdivision of a State, with its consent.

OBLIGATIONAL AUTHORITY

29 USC 1581.

SEC. 171. Notwithstanding any other provision of this Act, no authority to enter into contracts or financial assistance agreements under this Act shall be effective except to such extent or in such amount as are provided in advance in appropriation Acts.

PART E—MISCELLANEOUS PROVISIONS

TRANSITION

29 USC 1591.

SEC. 181. (a) Except as otherwise provided in this section, the Secretary, from funds appropriated pursuant to this Act or pursuant to the Comprehensive Employment and Training Act, shall provide financial assistance under this Act in the same manner that such assistance was provided under the Comprehensive Employment and Training Act (as in effect on the day before the enactment of this Act) until September 30, 1983.

Post, p. 1357.

(b) The Commission established by title V of the Comprehensive Employment and Training Act shall continue to be authorized until September 30, 1983, and on such date the personnel, property, and records of such Commission shall be transferred to the Commission established by part F of title IV of this Act.

Post, p. 1357.

Post, p. 1387

(c) Notwithstanding the provisions of subsection (a), Governors, prime sponsors, and other recipients of financial assistance under this Act, or under the Comprehensive Employment and Training Act, may expend funds received under this Act, or under the Comprehensive Employment and Training Act, prior to October 1, 1983, in order to—

Post, p. 1357.

(1) administer consolidated programs formed by the combining of programs previously administered under different titles, parts, and subparts of the Comprehensive Employment and Training Act;

(2) establish for new participants, in accordance with the eligibility criteria for title II of this Act, uniform eligibility criteria and other provisions relating to participation for programs consolidated pursuant to paragraph (1);

(3) conduct planning for any program or activity authorized under this Act; and

(4) conduct any other activity deemed necessary by the recipient to provide for an orderly transition to the operation, as of October 1, 1983, of programs under this Act.

Effective date.

(d) All orders, determinations, rules, regulations, permits, grants, contracts, certificates, licenses, and privileges, which have been issued under the Comprehensive Employment and Training Act (as in effect on the date before the date of enactment of this Act), or which are issued under that Act on or before September 30, 1983, shall continue in effect until modified or revoked by the Secretary, by a court of competent jurisdiction, or by operation of law other than this Act.

(e) The provisions of this Act shall not affect administrative or judicial proceedings pending on the date of enactment of this Act, or begun between the date of enactment of this Act and September 30, 1984, under the Comprehensive Employment and Training Act.

Publications in Federal Register.

(f)(1) By January 1, 1983, the Secretary shall have published in the Federal Register final regulations governing the establishment of the State job training coordinating councils and the designation of service delivery areas.

(2) By January 15, 1983, the Secretary shall have published in the Federal Register final regulations governing the establishment of private industry councils.

(3) By March 15, 1983, the Secretary shall have published in the Federal Register final regulations governing all aspects of programs under title II of this Act not described in paragraphs (1) and (2) of this subsection.

Effective dates.

(4) All other regulations for programs under this Act shall take effect no later than October 1, 1983.

Publications in Federal Register.

(5) Pursuant to section 169(a) of this Act the rules described in paragraphs (1), (2), and (3) of this section shall take effect thirty days after publication. In promulgating the rules described in paragraphs (1), (2), and (3), the Secretary shall be exempt from all requirements of law regarding rulemaking procedures except that such rules, prior to their publication in final form, shall be published in the Federal Register for comment for thirty days in the case of rules under paragraphs (2) and (3) and twenty days in the case of rules under paragraph (1).

(6) The Secretary may subsequently modify rules issued pursuant to paragraphs (1), (2), and (3) but, with respect to the program period October 1, 1983, to June 30, 1984, such subsequent rules shall not affect the legitimacy of any State job training coordinating council

Effective rules.

or private industry council, or the composition of any service delivery area, established under the rules issued pursuant to paragraphs (1) or (2). In addition, with respect to the program period October 1, 1983, to June 30, 1984, no modifications of the rules published pursuant to paragraph (3) shall be effective unless they are published in final form by May 15, 1983.

Post, p. 1357.

(7) Upon the certification of any private industry council under section 102(g) the Secretary, from discretionary funds appropriated under this Act or Comprehensive Employment Training Act, for fiscal year 1983, may provide up to $80,000 to each such council to assist it in performing its functions under section 103.

(g) Notwithstanding any other provision of law, any real or nonexpendable personal property, which was acquired on or before September 30, 1983, by prime sponsors (including by their contractors or subrecipients) with funds under the Comprehensive Employment and Training Act or under this Act, and with respect to which the Secretary reserved the right to take title, shall be transferred, as of October 1, 1983, from such prime sponsors to the custody of the entity which is administering programs under title II of this Act in the geographic area in which such property is located. Such transfer shall be subject to the Secretary's rights in such property, which shall continue unchanged.

(h) Funds for fiscal year 1982 allocated to areas served by prime sponsors or to other recipients under the Comprehensive Employment and Training Act, which were not obligated by the prime sponsor or other recipient prior to the end of such fiscal year, shall remain available for obligation by the prime sponsor or other recipient during fiscal year 1983. No reduction shall be made in the allocation for any area served by such a prime sponsor from appropriations to carry out this Act for fiscal year 1983 on account of the carryover of such funds from fiscal year 1982 to fiscal year 1983.

Effective date.

(i) The amendments made by sections 501 and 502 shall be effective October 1, 1983, but the Secretary is authorized to use funds appropriated for fiscal year 1983 to plan for the orderly implementation of such amendments.

(j)(1) In order to facilitate the development of a service delivery area's job training plan for the program period October 1, 1983, to June 30, 1984, the various time limits contained in this Act which pertain to the planning process shall not be applicable, except that the job training plan must be submitted to the Governor by August 31, 1983. This provision shall apply only to the time limits and shall not apply to any of the required planning procedures, or to the required chronological order of such procedures except that the job training plan and budget need only be for the October 1, 1983 to June 30, 1984 program period.

Post, p. 1357.

(2) In order to facilitate planning for the program period October 1, 1983, to June 30, 1984, the local agreement or agreements between the private industry council and the appropriate chief elected official or officials may provide for interim procedures applicable only to that program. Such interim agreements may also, notwithstanding the provisions of section 107, authorize service deliverers under the Comprehensive Employment and Training Act or under this Act during fiscal year 1983 to continue as service deliverers under the program as established by this Act for such period.

(3) The performance standards described in section 106 shall apply to service delivery areas for the program period October 1, 1983, to June 30, 1984. No service delivery area, however, shall suffer a

penalty for not meeting such standards during that initial program period.

(k) All participants who are in programs funded under this Act, or under the Comprehensive Employment and Training Act, on September 30, 1983, shall be eligible to continue to participate in such programs, provided such programs have been approved for funding under the service delivery area's newly effective job training plan.

Infra.

CRIMINAL PROVISIONS

Sec. 182. Section 665 of title 18, United States Code, is amended to read as follows:

"THEFT OR EMBEZZLEMENT FROM EMPLOYMENT AND TRAINING FUNDS: IMPROPER INDUCEMENT; OBSTRUCTION OF INVESTIGATIONS

Penalty.

29 USC 801 note.

Ante, p. 1322.

"Sec. 665. (a) Whoever, being an officer, director, agent, or employee of, or connected in any capacity with any agency or organization receiving financial assistance or any funds under the Comprehensive Employment and Training Act or the Job Training Partnership Act knowingly enrolls an ineligible participant, embezzles, willfully misapplies, steals, or obtains by fraud any of the moneys, funds, assets, or property which are the subject of a financial assistance agreement or contract pursuant to such Act shall be fined not more than $10,000 or imprisoned for not more than 2 years, or both; but if the amount so embezzled, misapplied, stolen, or obtained by fraud does not exceed $100, such person shall be fined not more than $1,000 or imprisoned not more than 1 year, or both.

Penalty.

"(b) Whoever, by threat or procuring dismissal of any person from employment or of refusal to employ or refusal to renew a contract of employment in connection with a financial assistance agreement or contract under the Comprehensive Employment and Training Act or the Job Training Partnership Act induces any person to give up any money or thing of any value to any person (including such organization or agency receiving funds) shall be fined not more than $1,000, or imprisoned not more than 1 year, or both.

Penalty.

"(c) Any person whoever willfully obstructs or impedes or willfully endeavors to obstruct or impede, an investigation or inquiry under the Comprehensive Employment and Training Act or the Job Training Partnership Act, or the regulations thereunder, shall be punished by a fine of not more than $5,000, or by imprisonment for not more than 1 year, or by both such fine and imprisonment.".

REFERENCE

29 USC 1592.

Sec. 183. Effective on the date of enactment of this Act, all references in any other statute other than this Act, and other than in section 665 of title 18, United States Code, to the Comprehensive Employment and Training Act shall be deemed to refer to the Job Training Partnership Act.

REPEALERS

Sec. 184. (a) Effective on the date of enactment of this Act—

29 USC 801 *et seq.*

(1) the Comprehensive Employment and Training Act is repealed;

Repeal. 29 USC 829a. (2) section 5(b) of the Comprehensive Employment and Training Act Amendments of 1978 is repealed.

TITLE II—TRAINING SERVICES FOR THE DISADVANTAGED

Part A—Adult and Youth Programs

ALLOTMENT

29 USC 1601. Sec. 201. (a) Not more than $5,000,000 of the amount appropriated pursuant to section 3(a)(1) for each fiscal year and available for this part shall be allotted among Guam, the Virgin Islands, American Samoa, the Trust Territory of the Pacific Islands, and the Northern Mariana Islands.

(b)(1) Subject to the provisions of paragraph (2), of the remainder of the amount available for this part for each fiscal year—

(A) 33⅓ percent shall be allotted on the basis of the relative number of unemployed individuals residing in areas of substantial unemployment in each State as compared to the total number of such unemployed individuals in all such areas of substantial unemployment in all the States;

(B) 33⅓ percent shall be allotted on the basis of the relative excess number of unemployed individuals who reside in each State as compared to the total excess number of unemployed individuals in all the States;

(C) 33⅓ percent shall be allotted on the basis of the relative number of economically disadvantaged individuals within the State compared to the total number of economically disadvantaged individuals in all States, except that, for the allotment for any State in which there is any service delivery area described in section 101(a)(4)(A)(iii), the allotment shall be based on the higher of the number of adults in families with an income below the low-income level in such area or the number of economically disadvantaged individuals in such area.

(2)(A) No State shall receive less than one-quarter of 1 percent of the amounts available for allotment under this subsection for each such fiscal year.

(B) No State shall be allotted less than 90 percent of its allotment percentage for the fiscal year preceding the fiscal year for which the determination is made. For the purpose of this subparagraph, the allotment percentage for each State for the fiscal year 1982 is the percent that each State received in 1982, pursuant to the formula allocations made under the Comprehensive Employment and Training Act, of the total such formula allocations for all States made under that Act in fiscal year 1982. *Ante*, p. 1357. For each succeeding fiscal year, the allotment percentage of a State shall be the percentage which the State received of all allotments pursuant to this subsection.

Definitions. (3) For purposes of paragraph (1)—

(A) the term "excess number" means the number which represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in the State, or the number which represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment in such State; and

(B) the term "economically disadvantaged" means an individual who has, or is a member of a family which has, received a total family income (exclusive of unemployment compensation, child support payments, and welfare payments) which, in relation to family size, was not in excess of the higher of (i) the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, or (ii) 70 percent of the lower living standard income level.

WITHIN STATE ALLOCATION

SEC. 202. (a)(1) The Governor shall, in accordance with section 162, allocate 78 percent of the allotment of the State (under section 201(b)) for such fiscal year among service delivery areas within the State in accordance with paragraph (2). 29 USC 1602

(2) Of the amount allocated under this subsection—

(A) 33⅓ percent shall be allocated on the basis of the relative number of unemployed individuals residing in areas of substantial unemployment in each service delivery area as compared to the total number of such unemployed individuals in all such areas of substantial unemployment in the State;

(B) 33⅓ percent shall be allocated on the basis of the relative excess number of unemployed individuals who reside in each service delivery area as compared to the total excess number of unemployed individuals in all service delivery areas in the State;

(C) 33⅓ percent shall be allocated on the basis of the relative number of economically disadvantaged individuals within each service delivery area compared to the total number of economically disadvantaged individuals in the State, except that the allocation for any service delivery area described in section 101(a)(4)(A)(iii) shall be based on the higher of the number of adults in families with an income below the low-income level in such area or the number of economically disadvantaged individuals in such area.

(3) For the purpose of this section— Definitions

(A) the term "excess number" means the number which represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in the service delivery area or the number which represents the number of unemployed individuals in excess of 4.5 percent of the civilian labor force in areas of substantial unemployment in such service delivery area; and

(B) the term "economically disadvantaged" means an individual who has, or is a member of a family which has, received a total family income (exclusive of unemployment compensation, child support payments, and welfare payments) which, in relation to family size, was not in excess of the higher of (i) the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, or (ii) 70 percent of the lower living standard income level.

(b)(1) Eight percent of the allotment of each State (under section 201(b)) for each fiscal year shall be available to carry out section 123, relating to State education programs under this Act.

(2) Three percent of such allotment of each State for each fiscal year shall be available to carry out section 124, relating to training programs for older individuals.

(3)(A) Six percent of such allotment of each State for each fiscal year shall be available to carry out subparagraph (B) of this paragraph.

Incentive grants.

(B) The amount reserved under subparagraph (A) of this paragraph shall be used by the Governor to provide incentive grants for programs exceeding performance standards, including incentives for serving hard-to-serve individuals. The incentive grants made under this subparagraph shall be distributed among service delivery areas within the State exceeding their performance standards in an equitable proportion based on the degree by which the service delivery areas exceed their performance standards. If the full amount reserved under subparagraph (A) of this paragraph is not needed to make incentive grants under this subparagraph, the Governor shall use the amount not so needed for technical assistance to service delivery areas in the State which do not qualify for incentive grants under this subparagraph.

(4) Five percent of such allotment of the State for each fiscal year shall be available to the Governor of the State to be used for the cost of auditing activities, for administrative activities, and for other activities under sections 121 and 122.

ELIGIBILITY FOR SERVICES

29 USC 1603.

SEC. 203. (a)(1) Except as provided in paragraph (2), an individual shall be eligible to particpate in programs receiving assistance under this title only if such individual is economically disadvantaged.

(2) Up to 10 percent of the participants in all programs in a service delivery area receiving assistance under this part may be individuals who are not economically disadvantaged if such individuals have encountered barriers to employment. Such individuals may include, but are not limited to, those who have limited English-language proficiency, or are displaced homemakers, school dropouts, teenage parents, handicapped, older workers, veterans, offenders, alcoholics, or addicts.

(b)(1) Funds provided under this part shall be used in accordance with the job training plan to provide authorized services to disadvantaged youth and adults. Except as provided in paragraph (2), not less than 40 percent of the funds available for such services shall be expended to provide such services to eligible youth.

(2) To the extent that the ratio of economically disadvantaged youth to economically disadvantaged adults in the service delivery area differs from the ratio of such individuals nationally (as published by the Secretary), the amount which shall be required to expend for services for youth under paragraph (1) shall be reduced or increased proportionately in accordance with regulations prescribed by the Secretary.

42 USC 601.
42 USC 602.

School dropout.

(3) Recipients of payments made under the program of aid to families with dependent children under a State plan approved under part A of title IV of the Social Security Act who are required to, or have, registered under section 402(a)(19) of that Act and eligible school dropouts shall be served on an equitable basis, taking into account their proportion of economically disadvantaged persons sixteen years of age or over in the area. For purposes of this paragraph, a school dropout is an individual who is neither attending any school nor subject to a compulsory attendance law and who has not received a secondary school diploma or a certificate from a program of equivalency for such a diploma.

(4) In each service delivery area the ratio of participants in on-the-job training assisted under this title in the public sector to partici-

pants in such training in the private sector shall not exceed the ratio between civilian governmental employment and nongovernmental employment in such area.

(c) For purposes of this title—

(1) the term "youth" means an individual who is aged 16 through 21, and "Youth."

(2) the term "adult" means an individual who is 22 years of age or older. "Adult."

USE OF FUNDS

SEC. 204. Services which may be made available to youth and adults with funds provided under this title may include, but need not be limited to— 29 USC 1604.

(1) job search assistance,

(2) job counseling,

(3) remedial education and basic skills training,

(4) institutional skill training,

(5) on-the-job training,

(6) programs of advanced career training which provide a formal combination of on-the-job and institutional training and internship assignments which prepare individuals for career employment,

(7) training programs operated by the private sector, including those operated by labor organizations or by consortia of private sector employers utilizing private sector facilities, equipment, and personnel to train workers in occupations for which demand exceeds supply,

(8) outreach to make individuals aware of, and encourage the use of employment and training services,

(9) specialized surveys not available through other labor market information sources,

(10) programs to develop work habits and other services to individuals to help them obtain and retain employment,

(11) supportive services necessary to enable individuals to participate in the program and to assist them in retaining employment for not to exceed 6 months following completion of training,

(12) upgrading and retraining,

(13) education-to-work transition activities,

(14) literacy training and bilingual training,

(15) work experience,

(16) vocational exploration,

(17) attainment of certificates of high school equivalency,

(18) job development,

(19) employment generating activities to increase job opportunities for eligible individuals in the area,

(20) pre-apprenticeship programs,

(21) disseminating information on program activities to employers,

(22) use of advanced learning technology for education, job preparation, and skills training,

(23) development of job openings,

(24) on-site industry-specific training programs supportive of industrial and economic development,

(25) followup services with participants placed in unsubsidized employment,

(26) coordinated programs with other Federal employment-related activities,

(27) needs-based payments necessary to participation in accordance with a locally developed formula or procedure, and

(28) customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of that training.

EXEMPLARY YOUTH PROGRAMS

29 USC 1605.

SEC. 205. (a) In addition to the services for youth which may be available in accordance with section 204, the job training plan may, at the option of those responsible for its preparation, elect to include one or more of the exemplary youth programs described in subsections (b) through (e) of this section, each of which may be modified by the plan to accommodate local conditions.

(b)(1) The job training plan may provide for the conduct of an "education for employment program" for eligible youth who have not attained a high school diploma or who have educational deficiencies despite the attainment of a diploma, with priority given to high school dropouts.

(2) The education for employment programs may provide for the maintenance of a network of learning centers offering individualized or group instruction in convenient locations, such as schools, neighborhood organizations, libraries, and other sites, including mobile vans in rural areas.

(3) The curricula provided by such network shall be designed to prepare the student to meet State and locally determined general education diploma and basic education competency requirements.

(4) For purposes of this section, priority shall be given in the selection of service providers to previously funded in-school and community based organization projects which are both cost-effective and of demonstrated success, and which otherwise meet criteria under this Act.

Preemployment skills training program.

(c)(1) The job training plan may provide for the conduct of a "preemployment skills training program" for youth, and individuals aged 14 and 15, with priority being given to those individuals who do not meet established levels of academic achievement and who plan to enter the full-time labor market upon leaving school.

(2) The preemployment skill training program may provide youth up to 200 hours of instruction and activities.

(3) The instruction and activities may include—

(A) assessment, testing, and counseling;
(B) occupational career and vocational exploration;
(C) job search assistance;
(D) job holding and survival skills training;
(E) basic life skills training;
(F) remedial education;
(G) labor market information; and
(H) job-seeking skills training.

Entry employment experience program

(d)(1) The job training plan may provide for the conduct of an "entry employment experience program" for youth who—

(A) have completed preemployment skills training or its equivalent;

(B) have not recently held a regular part-time or summer job for more than 250 hours of paid employment, except that this paragraph may be waived in accordance with criteria established in the job training plan; and

(C) are enrolled in a secondary school or an institution offering a certified high school equivalency program and are meeting or have met the minimum academic and attendance requirements of that school or education program during the current or most recent term,

with priority given to youth who do not plan to continue on to postsecondary education.

Entry employment experiences.

(2) Entry employment experiences may be up to 20 hours weekly during the school year or full time during the summer and holidays, for a total of not to exceed 500 hours of entry employment experience for any individual. Such experiences shall be appropriately supervised, including the maintenance of standards of attendance and worksite performance.

(3) Entry employment experiences may be one of the following types:

(A) Full-time employment opportunities in public and private nonprofit agencies during the summer and on a part-time basis in combination with education and training activities. These jobs shall provide community improvement services that complement local expenditures.

(B) Tryout employment at private for-profit worksites, or at public and private nonprofit worksites when private for-profit worksites are not available. Compensation in lieu of wages for tryout employment shall be paid by the grant recipient, but the length of any assignment to a tryout employment position shall not exceed 250 hours. Tryout employment positions shall be ones for which participants would not usually be hired (because of lack of experience or other barriers to employment), and vacancies in such positions may not be refilled if the previous participant completed the tryout employment but was not hired by the employer.

(C) Cooperative education programs to coordinate educational programs with work in the private sector.

School-to-work transition assistance program.

(e)(1) The job training plan may provide for the conduct of a "school-to-work transition assistance program" for youth who are—

(A) high school seniors who plan to enter the full-time labor market upon graduation, with priority to seniors in high schools having a predominance of students from families with incomes below 70 percent of the lower living standard income level; and

(B) dropouts, with followup as immediately as possible after leaving school.

(2) Transition services include—

(A) provision of occupational information;

(B) short-duration job search assistance;

(C) job clubs;

(D) placement and job development; and

(E) followup.

(3) Seniors and dropouts who are eligible for and in need of training activities may be provided information and, where appropriate, referred to—

(A) preemployment skills training, entry employment experience, and remedial education;

(B) adult training activities; and

(C) the Job Corps.

PART B—SUMMER YOUTH EMPLOYMENT AND TRAINING PROGRAMS

AUTHORIZATION OF APPROPRIATIONS; ALLOTMENT AND ALLOCATION

29 USC 1631. SEC. 251. (a) From the funds appropriated under section 3(b), the Secretary shall first allocate to Guam, the Virgin Islands, American Samoa, the Trust Territory of the Pacific Islands, the Northern Mariana Islands, and entities eligible under section 401 the same percentage of funds as were available to such areas and entities for the summer youth program in the fiscal year preceding the fiscal year for which the determination is made.

(b) The remainder of sums appropriated pursuant to section 3(b) shall be allotted among States in accordance with section 201(b) and allocated among service delivery areas within States in accordance with section 202(a)(2) and (3).

USE OF FUNDS

29 USC 1632. SEC. 252. Funds available under this part may be used for—

(1) basic and remedial education, institutional and on-the-job training, work experience programs, employment counseling, occupational training preparation for work, outreach and enrollment activities, employability assessment, job referral and placement, job search and job club activities, and any other employment or job training activity designed to give employment to eligible individuals or prepare them for, and place them in, employment; and

(2) supportive services necessary to enable such individuals to participate in the program.

LIMITATIONS

29 USC 1633. SEC. 253. (a) Programs under this part shall be conducted during the summer months.

(b) Except as provided in subsection (c), individuals eligible under this part shall be economically disadvantaged youth.

(c) Eligible individuals aged 14 or 15 shall, if appropriate and set forth in the job training plan, be eligible for summer youth programs under this part.

APPLICABLE PROVISIONS

29 USC 1634.
Ante, p. 1327.

SEC. 254. Private industry councils established under title I, chief elected officials, State job training coordinating councils, and Governors shall have the same authority, duties, and responsibilities with respect to planning and administration of funds available under this part as private industry councils, chief elected officials, State job training coordinating councils, and Governors have for funds available under part A of title II.

Ante, p. 1358.

TITLE III—EMPLOYMENT AND TRAINING ASSISTANCE FOR DISLOCATED WORKERS

ALLOCATION OF FUNDS

29 USC 1651. SEC. 301. (a) From the amount appropriated to carry out this title for any fiscal year, the Secretary may reserve up to 25 percent of such amount for use by the States in accordance with subsection (c).

Funds allocation.

(b) The Secretary shall allot the remainder of the amount appropriated to carry out this title for any fiscal year among the States as follows:

(1) One-third of the remainder of such amount shall be allotted among the States on the basis of the relative number of unemployed individuals who reside in each State as compared to the total number of unemployed individuals in all the States.

"Excess number."

(2) One-third of the remainder of such amount shall be allotted among the States on the basis of the relative excess number of unemployed individuals who reside in each State as compared to the total excess number of unemployed individuals in all the States. For purposes of this paragraph, the term "excess number" means the number which represents unemployed individuals in excess of 4.5 percent of the civilian labor force in the State.

(3) One-third of the remainder of such amount shall be allotted among the States on the basis of the relative number of individuals who have been unemployed for fifteen weeks or more and who reside in each State as compared to the total number of such individuals in all the States.

Funding application, submittal.

(c) The Secretary shall make available the sums reserved under subsection (a) for the purpose of providing training, retraining, job search assistance, placement, relocation assistance, and other aid (including any activity authorized by section 303) to individuals who are affected by mass layoffs, natural disasters, Federal Government actions (such as relocations of Federal facilities), or who reside in areas of high unemployment or designated enterprise zones. In order to qualify for assistance from funds reserved by the Secretary under subsection (a), a State shall, in accordance with regulations promulgated by the Secretary establishing criteria for awarding assistance from such funds, submit an application identifying the need for such assistance and the types of, and projected results expected from, activities to be conducted with such funds.

(d) The Secretary is authorized to reallot any amount of any allotment to a State to the extent that the Secretary determines that the State will not be able to obligate such amount within one year of allotment.

IDENTIFICATION OF DISLOCATED WORKERS

29 USC 1652.

SEC. 302. (a) Each State is authorized to establish procedures to identify substantial groups of eligible individuals who—

(1) have been terminated or laid-off or who have received a notice of termination or lay-off from employment, are eligible for or have exhausted their entitlement to unemployment compensation, and are unlikely to return to their previous industry or occupation;

(2) have been terminated, or who have received a notice of termination of employment, as a result of any permanent closure of a plant or facility; or

(3) are long-term unemployed and have limited opportunities for employment or reemployment in the same or a similar occupation in the area in which such individuals reside, including any older individuals who may have substantial barriers to employment by reason of age.

(b) The State may provide for the use of the private industry councils established under title I of this Act to assist in making the identification established under subsection (a).

(c)(1) Whenever a group of eligible individuals is identified under subsection (a), the State, with the assistance of the private industry council, shall determine what, if any, job opportunities exist within the local labor market area or outside the labor market area for which such individuals could be retrained.

(2) The State shall determine whether training opportunities for such employment opportunities exist or could be provided within the local labor market area.

(d) Whenever training opportunities pursuant to subsection (c) are identified, information concerning the opportunities shall be made available to the individuals. The acceptance of training for such opportunities shall be deemed to be acceptance of training with the approval of the State within the meaning of any other provision of Federal law relating to unemployment benefits.

AUTHORIZED ACTIVITIES

29 USC 1653.

SEC. 303. (a) Financial assistance provided to States under this title may be used to assist eligible individuals to obtain unsubsidized employment through training and related employment services which may include, but are not limited to—

(1) job search assistance, including job clubs,

(2) job development,

(3) training in jobs skills for which demand exceeds supply,

(4) supportive services, including commuting assistance and financial and personal counseling,

(5) pre-layoff assistance,

(6) relocation assistance, and

(7) programs conducted in cooperation with employers or labor organizations to provide early intervention in the event of closures of plants or facilities.

(b) Relocation assistance may be provided if the State determines (1) that the individual cannot obtain employment within the individual's commuting area, and (2) that the individual has secured suitable long-duration employment or obtained a bona fide job offer in a relocation area in a State.

MATCHING REQUIREMENT

29 USC 1654.

SEC. 304. (a)(1) In order to qualify for financial assistance under this title, a State shall demonstrate, to the satisfaction of the Secretary, that it will expend for purposes of services assisted under this title, an amount from public or private non-Federal sources equal to the amount made available to that State under section 301(b).

(2) Whenever the average rate of unemployment for a State is higher than the average rate of unemployment for all States, the non-Federal matching funds described in paragraph (1) required to be provided by such State for that fiscal year shall be reduced by 10 percent for each 1 percent, or portion thereof, by which the average rate of unemployment for that State is greater than the average rate of unemployment for all States.

(3) The Secretary shall determine the average rate of unemployment for a State and the average rate of unemployment for all

States for each fiscal year on the basis of the most recent twelve-month period prior to that fiscal year.

(b)(1) Such non-Federal matching funds shall include the direct cost of employment or training services under this title provided by State or local programs (such as vocational education), private nonprofit organizations, or private for-profit employers.

(2) Funds expended from a State fund to provide unemployment insurance benefits to an eligible individual for purposes of this title and who is enrolled in a program of training or retraining under this title may be credited for up to 50 percent of the funds required to be expended from non-Federal sources as required by this section.

PROGRAM REVIEW

Sec. 305. Except for programs of assistance operated on a statewide or industry-wide basis, no program of assistance conducted with funds made available under this title may be operated within any service delivery area without a 30-day period for review and recommendation by the private industry council and appropriate chief elected official or officials for such area. The State shall consider the recommendation of such private industry council and chief elected official or officials before granting final approval of such program, and in the event final approval is granted contrary to such recommendation, the State shall provide the reasons therefor in writing to the appropriate private industry council and chief elected official or officials. 29 USC 1655.

CONSULTATION WITH LABOR ORGANIZATIONS

Sec. 306. Any assistance program conducted with funds made available under this title which will provide services to a substantial number of members of a labor organization shall be established only after full consultation with such labor organization. 29 USC 1656.

LIMITATIONS

Sec. 307. (a) Except as provided in subsection (b), there shall be available for supportive services, wages, allowances, stipends, and costs of administration, not more than 30 percent of the Federal funds available under this title in each State. 29 USC 1657.

(b) The funds to which the limitation described in subsection (a) applies shall not include the funds referred to in section 301(a). In no event shall such limitation apply to more than 50 percent of the total amount of Federal and non-Federal funds available to a program.

STATE PLANS; COORDINATION WITH OTHER PROGRAMS

Sec. 308. Any State which desires to receive financial assistance under this title shall submit to the Secretary a plan for the use of such assistance which shall include appropriate provisions for the coordination of programs conducted with such assistance, as described in section 121, low-income weatherization and other energy conservation programs, and social services. 29 USC 1658.

TITLE IV—FEDERALLY ADMINISTERED PROGRAMS

PART A—EMPLOYMENT AND TRAINING PROGRAMS FOR NATIVE AMERICANS AND MIGRANT AND SEASONAL FARMWORKERS

NATIVE AMERICAN PROGRAMS

29 USC 1671.

SEC. 401. (a) The Congress finds that (1) serious unemployment and economic disadvantages exist among members of Indian, Alaskan Native, and Hawaiian Native communities; (2) there is a compelling need for the establishment of comprehensive training and employment programs for members of those communities; and (3) such programs are essential to the reduction of economic disadvantages among individual members of those communities and to the advancement of economic and social development in the communities consistent with their goals and lifestyles.

(b) The Congress therefore declares that, because of the special relationship between the Federal Government and most of the individuals to be served by the provisions of this section, (1) such programs shall be administered at the national level; (2) such programs shall be available to federally recognized Indian tribes, bands, and groups and to other groups and individuals of Native American descent; and (3) such programs shall be administered in such a manner as to maximize the Federal commitment to support growth and development as determined by representatives of the communities and groups served by this section.

(c)(1)(A) In carrying out responsibilities under this section, the Secretary shall, wherever possible, utilize Indian tribes, bands, or groups on Federal or State reservations, Oklahoma Indians, and including for the purpose of this Act, Alaska Native villages or groups as defined in the Alaska Native Claims Settlement Act, having a governing body for the provision of employment and training services under this section. When the Secretary determines that such tribe, band, or group has demonstrated the capability to effectively administer a comprehensive employment and training program, the Secretary shall require such tribe, band, or group to submit a comprehensive plan meeting such requirements as the Secretary prescribes.

43 USC 1601 note.

(B) The Secretary shall arrange for programs to meet the employment and training needs of Hawaiian natives through such organizations as the Secretary determines will best meet their needs.

(2) In carrying out responsibilities under this section, the Secretary shall make arrangements with organizations (meeting requirements prescribed by the Secretary) serving nonreservation Native Americans for programs and projects designed to meet the needs of such Native Americans for employment and training and related services.

(d) Whenever the Secretary determines not to utilize Indian tribes, bands, or groups for the provision of employment and training services under this section, the Secretary shall, to the maximum extent feasible, enter into arrangements for the provision of such services with organizations which meet with the approval of the tribes, bands, or groups to be served.

(e) The Secretary is directed to take appropriate action to establish administrative procedures and machinery (including personnel having particular competence in this field) for the selection, administration, monitoring, and evaluation of Native American employment and training programs authorized under this Act.

(f) Funds available for this section shall be expended for programs and activities consistent with the purposes of this section including but not limited to such programs and activities carried out by recipients under other provisions of this Act.

(g) No provision of this section shall abrogate in any way the trust responsibilities of the Federal Government to Native American bands, tribes, or groups.

Rules, regulations and performance standards.

(h)(1) The Secretary shall, after consultation with representatives of Indians and other Native Americans, prescribe such rules, regulations, and performance standards relating to Native American programs under this section as may be required to meet the special circumstances under which such programs operate.

Performance goals.

(2) Recipients of funds under this section shall establish performance goals, which shall, to the extent required by the Secretary, comply with performance standards established by the Secretary pursuant to section 103.

Technical assistance.

(i) The Secretary shall provide technical assistance as necessary to tribes, bands, and groups eligible for assistance under this section.

(j) For the purpose of carrying out this section, the Secretary shall reserve, from funds available for this title (other than part B) for any fiscal year, an amount equal to 3.3 percent of the amount available for part A of title II of this Act for such fiscal year.

MIGRANT AND SEASONAL FARMWORKER PROGRAMS

29 USC 1672.

SEC. 402. (a) The Congress finds and declares that—

(1) chronic seasonal unemployment and underemployment in the agricultural industry, aggravated by continual advancements in technology and mechanization resulting in displacement, constitute a substantial portion of the Nation's rural employment problem and substantially affect the entire national economy; and

(2) because of farmworker employment and training problems, such programs shall be centrally administered at the national level.

(b) The Secretary is directed to take appropriate action to establish administrative procedures and machinery (including personnel having particular competence in this field) for the selection, administration, monitoring, and evaluation of migrant and seasonal employment and training programs authorized under this Act.

(c)(1) The Secretary shall provide services to meet the employment and training needs of migrant and seasonal farmworkers through such public agencies and private nonprofit organizations as the Secretary determines to have an understanding of the problems of migrant and seasonal farmworkers, a familiarity with the area to be served, and a previously demonstrated capability to administer effectively a diversified employability development program for migrant and seasonal farmworkers. In awarding any grant or contract for services under this section, the Secretary shall use procedures consistent with standard competitive Government procurement policies.

Grants or contracts.

(2) The Secretary may approve the designation of grantees under this section for a period of two years.

(3) Programs and activities supported under this section, including those carried out under other provisions of this Act, shall enable

farmworkers and their dependents to obtain or retain employment, to participate in other program activities leading to their eventual placement in unsubsidized agricultural or nonagricultural employment, and to participate in activities leading to stabilization in agricultural employment, and shall include related assistance and supportive services.

Performance goals.

(4) Recipients of funds under this section shall establish performance goals, which shall, to the extent required by the Secretary, comply with performance standards established by the Secretary pursuant to section 103.

(5) No programs and activities supported under this section shall preclude assistance to farmworkers under any other provision of this Act.

(d) In administering programs under this section, the Secretary shall consult with appropriate State and local officials.

(e) The Secretary is directed to take appropriate action to establish administrative procedures and machinery (including personnel having particular competence in this field) for the selection, administration, monitoring, and evaluation of migrant and seasonal farmworker's employment and training programs authorized under this Act.

(f) For the purpose of carrying out this section, the Secretary shall reserve, from funds available for this title (other than part B) for any fiscal year, an amount equal to 3.2 percent of the amount available for part A of title II of this Act for such fiscal year.

Part B—Job Corps

STATEMENT OF PURPOSE

29 USC 1691.

Sec. 421. This part maintains a Job Corps for economically disadvantaged young men and women which shall operate exclusively as a distinct national program, sets forth standards and procedures for selecting individuals as enrollees in the Job Corps, authorizes the establishment of residential and nonresidential centers in which enrollees will participate in intensive programs of education, vocational training, work experience, counseling and other activities, and prescribes various other powers, duties, and responsibilities incident to the operation and continuing development of the Job Corps. The purpose of this part is to assist young individuals who need and can benefit from an unusually intensive program, operated in a group setting, to become more responsible, employable, and productive citizens; and to do so in a way that contributes, where feasible, to the development of national, State, and community resources, and to the development and dissemination of techniques for working with the disadvantaged that can be widely utilized by public and private institutions and agencies.

ESTABLISHMENT OF THE JOB CORPS

29 USC 1692.

Sec. 422. There shall be within the Department of Labor a "Job Corps".

INDIVIDUALS ELIGIBLE FOR THE JOB CORPS

29 USC 1693.

Sec. 423. To become an enrollee in the Job Corps, a young man or woman must be an eligible youth who—

(1) has attained age 14 but not attained age 22 at the time of enrollment, except that such maximum age limitation may be waived, in accordance with regulations of the Secretary, in the case of any handicapped individual; Waiver.

(2) is economically disadvantaged or is a member of a family which is economically disadvantaged, and who requires additional education, training, or intensive counseling and related assistance in order to secure and hold meaningful employment, participate successfully in regular school work, qualify for other suitable training programs, or satisfy Armed Forces requirements;

(3) is currently living in an environment so characterized by cultural deprivation, a disruptive homelife, or other disorienting conditions as to substantially impair prospects for successful participation in other programs providing needed training, education, or assistance;

(4) is determined, after careful screening as provided for in sections 424 and 425 to have the present capabilities and aspirations needed to complete and secure the full benefit of the Job Corps and to be free of medical and behavioral problems so serious that the individual could not adjust to the standards of conduct, discipline, work, and training which the Job Corps involves; and

(5) meets such other standards for enrollment as the Secretary may prescribe and agrees to comply with all applicable Job Corps rules and regulations.

SCREENING AND SELECTION OF APPLICANTS: GENERAL PROVISIONS

SEC. 424. (a) The Secretary shall prescribe specific standards and procedures for the screening and selection of applicants for the Job Corps. To the extent practicable, these rules shall be implemented through arrangements with agencies and organizations such as community action agencies, public employment offices, entities administering programs under title II of this Act, professional groups, labor organizations, and agencies and individuals having contact with youth over substantial periods of time and able to offer reliable information as to their needs and problems. The rules shall provide for necessary consultation with other individuals and organizations, including court, probation, parole, law enforcement, education, welfare, and medical authorities and advisers. The rules shall also provide for the interviewing of each applicant for the purpose of— Standards and procedures. 29 USC 1694.

(1) determining whether the applicant's educational and vocational needs can best be met through the Job Corps or an alternative program in the applicant's home community;

(2) obtaining from the applicant pertinent data relating to background, needs, and interests for determining eligibility and potential assignment; and

(3) giving the applicant a full understanding of the Job Corps and what will be expected of an enrollee in the event of acceptance.

(b) The Secretary is authorized to make payments to individuals and organizations for the cost of the recruitment, screening, and selection of candidates, as provided for in this part. The Secretary shall make no payments to any individual or organization solely as compensation for referring the names of candidates for Job Corps. Payments.

Rural areas, selection.

(c) The Secretary shall assure that Job Corps enrollees include an appropriate number of candidates selected from rural areas, taking into account the proportions of eligible youth who reside in rural areas and the need to provide residential facilities for such youth.

SCREENING AND SELECTION: SPECIAL LIMITATIONS

29 USC 1695.

SEC. 425. (a) No individual shall be selected as an enrollee unless there is reasonable expectation that the individual can participate successfully in group situations and activities, is not likely to engage in behavior that would prevent other enrollees from receiving the benefit of the program or be incompatible with the maintenance of sound discipline and satisfactory relationships between the center to which the individual might be assigned and surrounding communities, and unless the individual manifests a basic understanding of both the rules to which the individual will be subject and of the consequences of failure to observe those rules.

(b) An individual on probation or parole may be selected only if release from the supervision of the probation or parole officials is satisfactory to those officials and the Secretary and does not violate applicable laws or regulations. No individual shall be denied a position in the Job Corps solely on the basis of that individual's contact with the criminal justice system.

ENROLLMENT AND ASSIGNMENT

29 USC 1696.

SEC. 426. (a) No individual may be enrolled in the Job Corps for more than two years, except in any case in which completion of an advanced career program under section 428 would require an individual to participate in excess of two years, or except as the Secretary may authorize in special cases.

(b) Enrollment in the Job Corps shall not relieve any individual of obligations under the Military Selective Service Act (50 U.S.C. App. 451 et seq.).

Waiver.

(c) After the Secretary has determined that an enrollee is to be assigned to a Job Corps center, the enrollee shall be assigned to the center which is closest to the enrollee's home, except that the Secretary may waive this requirement for good cause, including to ensure an equitable opportunity for youth from various sections of the Nation to participate in the program, to prevent undue delays in assignment, to adequately meet the educational or other needs of an enrollee, and for efficiency and economy in the operation of the program.

JOB CORPS CENTERS

29 USC 1697.

20 USC 2304.

SEC. 427. (a)(1) The Secretary may make agreements with Federal, State, or local agencies, including a State board or agency designated pursuant to section 104(a)(1) of the Vocational Education Act of 1963 which operates or wishes to develop area vocational education school facilities or residential vocational schools (or both) as authorized by such Act, or private organizations for the establishment and operation of Job Corps centers. Job Corps centers may, subject to paragraph (2), be residential or nonresidential in character, or both, and shall be designed and operated so as to provide enrollees, in a well-supervised setting, with education, vocational training, work experience (either in direct program activities or through arrangements with employers), counseling, and other services appropriate to their needs. The centers shall include Civilian Conservation Centers, located primarily in rural areas, which shall provide, in addition to other training and assistance, programs of work experience to conserve, develop, or manage public natural resources or public recreational areas or to develop community projects in the public interest. The centers shall also include training centers located in either urban or rural areas which shall provide activities including training and other services for specific types of skilled or semiskilled employment.

(2) In any year, not more than 10 percent of the individuals enrolled in the Job Corps may be nonresidential participants.

(b) To the extent feasible, Job Corps centers shall offer education and vocational training opportunities, together with supportive services, on a nonresidential basis to participants in other programs under this Act. Such opportunities may be offered on a reimbursable basis or through such other arrangements as the Secretary may specify.

PROGRAM ACTIVITIES

29 USC 1698.

SEC. 428. (a) Each Job Corps center shall provide enrollees with an intensive, well-organized, and fully supervised program of education, vocational training, work experience, planned vocational and recreational activities, physical rehabilitation and development, and counseling. To the fullest extent feasible, the required program shall include activities to assist enrollees in choosing realistic career goals, coping with problems they may encounter in home communities, or in adjusting to new communities, and planning and managing their daily affairs in a manner that will best contribute to long-term upward mobility. Center programs shall include required participation in center maintenance work to assist enrollees in increasing their sense of contribution, responsibility, and discipline.

(b) The Secretary may arrange for enrollee education and vocational training through local public or private educational agencies, vocational educational institutions, or technical institutes, whenever such institutions provide training substantially equivalent in cost and quality to that which the Secretary could provide through other means.

Certificates of educational attainment.

(c) To the extent feasible, arrangements for education, both at the center and at other locations, shall provide opportunities for qualified enrollees to obtain the equivalent of a certificate of graduation from high school. The Secretary, with the concurrence of the Secretary of Education, shall develop certificates to be issued to each enrollee who satisfactorily completes service in the Job Corps and which will reflect the enrollee's level of educational attainment.

Advanced career training.

(d)(1) The Secretary may arrange for programs of advanced career training for selected Corps enrollees in which they may continue to participate for a period not to exceed one year in addition to the period of participation to which Corps enrollees would otherwise be limited.

(2) Advanced career training may be provided for in postsecondary institutions for Corps enrollees who have attained a high school diploma or its equivalent, have demonstrated commitment and capacity in their previous Job Corps participation, and have an identified occupational goal.

(3) The Secretary may contract with private for-profit businesses and labor unions to provide intensive training in company-sponsored training programs, combined with internships in work settings.

(4) During the period of participation in advanced career training programs, Corps enrollees shall be eligible for full Job Corps benefits or a monthly stipend equal to the average value of residential support, food, allowances, and other benefits in residential Job Corps centers, except that the total amount for which an enrollee shall be eligible shall be reduced by the amount of any scholarship or other educational grant assistance received by such enrollee.

(5) After an initial period of time, determined to be reasonable by the Secretary, any Job Corps center seeking to enroll new Corps enrollees in any advanced career training program shall demonstrate that such program has achieved a reasonable rate of completion and placement in training-related jobs before such new enrollments may occur.

ALLOWANCES AND SUPPORT

29 USC 1699.

Sec. 429. (a) The Secretary shall provide enrollees with such personal, travel, and leave allowances, and such quarters, subsistence, transportation, equipment, clothing, recreational services, and other expenses as he may deem necessary or appropriate to their needs. For the fiscal year ending September 30, 1983, personal allowances shall be established at a rate not to exceed $65 per month during the first six months of an enrollee's participation in the program and not to exceed $110 per month thereafter, except that allowances in excess of $65 per month, but not exceeding $110 per month, may be provided from the beginning of an enrollee's participation if it is expected to be of less than six months' duration and the Secretary is authorized to pay personal allowances in excess of the rates specified in this subsection in unusual circumstances as determined by him. Such allowances shall be graduated up to the maximum so as to encourage continued participation in the program, achievement and the best use by the enrollee of the funds so provided and shall be subject to reduction in appropriate cases as a disciplinary measure. To the degree reasonable, enrollees shall be required to meet or contribute to costs associated with their individual comfort and enjoyment from their personal allowances.

(b) The Secretary shall prescribe rules governing the accrual of leave by enrollees. Except in the case of emergency, he shall in no event assume transportation costs connected with leave of any enrollee who has not completed at least six months' service in the Job Corps.

Enrollment, termination.
Readjustment allowance.

(c) The Secretary may provide each former enrollee upon termination, a readjustment allowance at a rate not to exceed, for the fiscal year ending September 30, 1983, $110 for each month of satisfactory participation in the Job Corps. No enrollee shall be entitled to a readjustment allowance unless he has remained in the program at least 90 days, except in unusual circumstances as determined by the Secretary. The Secretary may, from time to time, advance to or on behalf of an enrollee such portions of his readjustment allowances as the Secretary deems necessary to meet extraordinary financial obligations incurred by that enrollee. The Secretary is authorized, pursuant to rules or regulations, to reduce the amount of an enrollee's readjustment allowance as a penalty for misconduct during participation in the Job Corps. In the event of an enrollee's death during his period of service, the amount of any unpaid readjustment allowance shall be paid in accordance with the provisions of section 5582 of title 5, United States Code.

(d) Such portion of the readjustment allowance as prescribed by the Secretary may be paid monthly during the period of service of the enrollee directly to a spouse or child of an enrollee, or to any other relative who draws substantial support from the enrollee, and any amount so paid shall be supplemented by the payment of an equal amount by the Secretary.

STANDARDS OF CONDUCT

SEC. 430. (a) Within Job Corps centers standards of conduct shall be provided and stringently enforced. If violations are committed by enrollees, dismissal from the Corps or transfers to other locations shall be made if it is determined that their retention in the Corps, or in the particular center, will jeopardize the enforcement of such standards or diminish the opportunities of other enrollees. 29 USC 1700.

(b) To promote the proper moral and disciplinary conditions in the Job Corps, the directors of Job Corps centers shall take appropriate disciplinary measures against enrollees, including dismissal from the Job Corps, subject to expeditious appeal to the Secretary.

COMMUNITY PARTICIPATION

SEC. 431. The Secretary shall encourage and cooperate in activities to establish a mutually beneficial relationship between Job Corps centers and nearby communities. These activities shall include the establishment of community advisory councils to provide a mechanism for joint discussion of common problems and for planning programs of mutual interest. Youth shall be represented on the advisory council and separate youth councils may be established composed of enrollees and young people from the communities. The Secretary shall assure that each center is operated with a view to achieving, so far as possible, objectives which shall include— 29 USC 1701

(1) giving community officials appropriate advance notice of changes in center rules, procedures, or activities that may affect or be of interest to the community;

(2) affording the community a meaningful voice in center affairs of direct concern to it, including policies governing the issuance and terms of passes to enrollees;

(3) providing center officials with full and rapid access to relevant community groups and agencies, including law enforcement agencies and agencies which work with young people in the community;

(4) encouraging the fullest practicable participation of enrollees in programs for community improvement or betterment, with appropriate advance consultation with business, labor, professional, and other interested community groups;

(5) arranging recreational, athletic, or similar events in which enrollees and local residents may participate together;

(6) providing community residents with opportunities to work with enrollees directly as part-time instructors, tutors, or advisers, either in the center or in the community;

(7) developing, where feasible, job or career opportunities for enrollees in the community; and

(8) promoting interchanges of information and techniques among, and cooperative projects involving, the center and community schools and libraries, educational institutions, agencies serving young people and recipients of funds under this Act.

COUNSELING AND JOB PLACEMENT

29 USC 1702.

SEC. 432. (a) The Secretary shall counsel and test each enrollee at regular intervals to measure progress in educational and vocational programs.

(b) The Secretary shall counsel and test enrollees prior to their scheduled terminations to determine their capabilities and shall make every effort to place them in jobs in the vocation for which they are trained or to assist them in attaining further training or education. In placing enrollees in jobs, the Secretary shall utilize the public employment service system to the fullest extent possible.

(c) The Secretary shall determine the status and progress of enrollees scheduled for termination and make every effort to assure that their needs for further education, training, and counseling are met.

(d) The Secretary shall arrange for the readjustment allowance to be paid to former enrollees (who have not already found employment) at the State employment service office nearest the home of any such former enrollee who is returning home, or at the nearest such office where the former enrollee has indicated an intent to reside. If the Secretary uses any other public agency or private organization in lieu of the public employment service system, the Secretary shall arrange for that organization or agency to pay the readjustment allowance.

EXPERIMENTAL AND DEVELOPMENTAL PROJECTS AND COORDINATION WITH OTHER PROGRAMS

29 USC 1703.

SEC. 433. (a)(1) The Secretary is authorized to undertake experimental, research, or demonstration projects to develop or test ways of better using facilities, encouraging a more rapid adjustment of enrollees to community life that will permit a reduction in their period of enrollment, reducing transportation and support costs, or otherwise promoting greater efficiency and effectiveness in the program. These projects shall include one or more projects providing youth with education, training, and other supportive services on a combined residential and nonresidential basis.

(2) The Secretary is authorized to undertake one or more pilot projects designed to determine the value of Job Corps participation for young adults aged 22 to 24, inclusive.

(3) The Secretary is authorized to undertake one or more pilot projects designed to involve youth who have a history of serious and violent behavior against persons or property, repetitive delinquent acts, narcotics addiction, or other behavioral aberrations.

(4) Projects under this subsection shall be developed after appropriate consultation with other Federal or State agencies conducting similar or related programs or projects and with the administrative entity in the communities where the projects will be carried out. They may be undertaken jointly with other Federal or federally assisted programs, and funds otherwise available for activities under those programs shall, with the consent of the head of any agency concerned, be available for projects under this section to the extent

Waiver.

Report to Congress.

they include the same or substantially similar activities. The Secretary is authorized to waive any provision of this part which the Secretary finds would prevent the carrying out of elements of projects under this subsection essential to a determination of their feasibility and usefulness. The Secretary shall, in the annual report of the Secretary, report to the Congress concerning the actions taken under this section, including a full description of progress made in connection with combined residential and nonresidential projects.

(b) In order to determine whether upgraded vocational education schools could eliminate or substantially reduce the school dropout problem, and to demonstrate how communities could make maximum use of existing educational and training facilities, the Secretary, in cooperation with the Secretary of Education, is authorized to enter into one or more agreements with State educational agencies to pay the cost of establishing and operating model community vocational education schools and skill centers.

(c)(1) The Secretary, through the Job Corps and activities authorized under sections 452 and 455, shall develop and implement activities designed to disseminate information gained from Job Corps program experience which may be of use in the innovation and improvement of related programs. To carry out this purpose, the Secretary may enter into appropriate arrangements with any Federal or State agency.

(2) The Secretary is authorized to develop Job Corps programs to test at various centers the efficacy of selected education or training activities authorized under this or any other Act and to appropriately disseminate the results of such tests. To carry out this purpose, the Secretary may enter into appropriate arrangements with any Federal or State agency.

Pilot projects.

Reimbursement.

(d) The Secretary is authorized to enter into appropriate arrangements with the Secretary of Defense for the development of pilot projects at Job Corps centers to prepare youth to qualify for military service. In the event that the Secretary of Labor and the Secretary of Defense agree that such pilot projects should be expanded into permanent programs, the Secretary may establish such permanent programs within the Job Corps, if the Secretary of Defense agrees (1) to provide 50 percent of the costs attributable to such permanent programs, and (2) to reimburse the Secretary of Labor for an additional amount if more than 50 percent of the enrollees in such programs become members of the Armed Forces. Such additional amount shall be equal to a percentage of such costs which is the percentage by which more than 50 percent of such enrollees become such members. In addition to the provision of funds, such reimbursement may include the provision of equipment, materials, transportation, technical assistance, or other assistance, as specified by the Secretary.

"Community-based organizations."

(e) In order to determine whether community participation as required under section 431 can be improved through the closer involvement of community-based organizations, the Secretary is authorized to undertake one or more pilot projects utilizing community-based organizations of demonstrated effectiveness for Job Corps center operation. For purposes of such pilot projects, the term "community-based organizations" may include nonprofit educational foundations organized on a State or local basis.

ADVISORY BOARDS AND COMMITTEES

29 USC 1704.

SEC. 434. The Secretary is authorized to make use of advisory committees in connection with the operation of the Job Corps, and the operation of Job Corps centers, whenever the Secretary determines that the availability of outside advice and counsel on a regular basis would be of substantial benefit in identifying and overcoming problems, in planning program or center development, or in strengthening relationships between the Job Corps and agencies, institutions, or groups engaged in related activities.

PARTICIPATION OF THE STATES

29 USC 1705.

SEC. 435. (a) The Secretary shall take action to facilitate the effective participation of States in the Job Corps programs, including consultation with appropriate State agencies on matters pertaining to the enforcement of applicable State laws, standards of enrollee conduct and discipline, development of meaningful work experience and other activities for enrollees, and coordination with State-operated programs.

(b) The Secretary is authorized to enter into agreements with States to assist in the operation or administration of State-operated programs which carry out the purpose of this part. The Secretary is authorized, pursuant to regulations, to pay part or all of the costs of such programs to the extent such costs are attributable to carrying out the purpose of this part.

Limitation.

(c) No Job Corps center or other similar facility designed to carry out the purpose of this part shall be established within a State unless a notice setting forth such proposed establishment has been submitted to the Governor, and the establishment has not been disapproved by the Governor within thirty days of such submission.

(d) All property which would otherwise be under exclusive Federal legislative jurisdiction shall be under concurrent jurisdiction with the appropriate State and locality with respect to criminal law enforcement as long as a Job Corps center is operated on such property.

APPLICATION OF PROVISIONS OF FEDERAL LAW

Federal employment.
29 USC 1706.

SEC. 436. (a) Except as otherwise provided in this subsection and in section 8143(a) of title 5, United States Code, enrollees in the Job Corps shall not be considered Federal employees and shall not be subject to the provisions of law relating to Federal employment, including those regarding hours of work, rates of compensation, leave, unemployment compensation, and Federal employee benefits:

(1) For purposes of the Internal Revenue Code of 1954 (26 U.S.C. 1 et seq.) and title II of the Social Security Act (42 U.S.C. 401 et seq.) enrollees shall be deemed employees of the United States and any service performed by an individual as an enrollee shall be deemed to be performed in the employ of the United States.

5 USC 8101 *et seq.*
"Employee."

(2) For purposes of subchapter I of chapter 81 of title 5, United States Code (relating to compensation to Federal employees for work injuries), enrollees shall be deemed civil employees of the United States within the meaning of the term "employee" as defined in section 8101 of title 5, United States Code, and the provisions of that subchapter shall apply except—

Performance of duty.

(A) the term "performance of duty" shall not include any act of an enrollee while absent from the assigned post of duty of such enrollee, except while participating in an activity (including an activity while on pass or during travel to or from such post or duty) authorized by or under the direction and supervision of the Job Corps;

Disability compensation.

(B) in computing compensation benefits for disability or death, the monthly pay of an enrollee shall be deemed that received under the entrance salary for a grade GS-2 employee, and sections 8113 (a) and (b) of title 5, United States Code, shall apply to enrollees; and

(C) compensation for disability shall not begin to accrue until the day following the date on which the injured enrollee is terminated.

(3) For purposes of the Federal tort claims provisions in title 28, United States Code, enrollees shall be considered employees of the Government.

(b) Whenever the Secretary finds a claim for damages to persons or property resulting from the operation of the Job Corps to be a proper charge against the United States, and it is not cognizable under section 2672 of title 28, United States Code, the Secretary is authorized to adjust and settle it in an amount not exceeding $1,500.

(c) Personnel of the uniformed services who are detailed or assigned to duty in the performance of agreements made by the Secretary for the support of the Corps shall not be counted in computing strength under any law limiting the strength of such services or in computing the percentage authorized by law for any grade in such services.

SPECIAL PROVISIONS

Women enrollment.
29 USC 1707.

Sec. 437. (a) The Secretary shall immediately take steps to achieve an enrollment of 50 percent women in the Job Corps consistent with (1) efficiency and economy in the operation of the program, (2) sound administrative practice, and (3) the socioeconomic, educational, and training needs of the population to be served.

(b) The Secretary shall assure that all studies, evaluations, proposals, and data produced or developed with Federal funds in the course of the Job Corps program shall become the property of the United States.

(c) Transactions conducted by private for-profit contractors for Job Corps centers which they are operating on behalf of the Secretary shall not be considered as generating gross receipts.

GENERAL PROVISIONS

29 USC 1708.

Sec. 438. The Secretary is authorized to—

(1) disseminate, with regard to the provisions of section 3204 of title 39, United States Code, data and information in such forms as the Secretary shall deem appropriate, to public agencies, private organizations, and the general public;

(2) collect or compromise all obligations to or held by the Secretary and all legal or equitable rights accruing to the Secretary in connection with the payment of obligations until such time as such obligations may be referred to the Attorney General for suit or collection; and

(3) expend funds made available for purposes of this part—

(A) for printing and binding, in accordance with applicable law and regulation; and

(B) without regard to any other law or regulation, for rent of buildings and space in buildings and for repair, alteration, and improvement of buildings and space in buildings rented by the Secretary, except that the Secretary shall not utilize the authority contained in this subparagraph—

(i) except when necessary to obtain an item, service, or facility, which is required in the proper administration of this part, and which otherwise could not be obtained, or could not be obtained in the quantity or quality needed, or at the time, in the form or under the conditions in which it is needed; and

(ii) prior to having given written notification to the Administrator of General Services (if the exercise of such authority would affect an activity which otherwise would be under the jurisdiction of the General Services Administration) of the Secretary's intention to exercise such authority, the item, service, or facility with respect to which such authority is proposed to be exercised, and the reasons and justifications for the exercise of such authority.

DONATIONS

29 USC 1709.

SEC. 439. The Secretary is authorized to accept on behalf of the Job Corps or individual Job Corps centers charitable donations of cash or other assistance, including but not limited to, equipment and materials, if such donations are available for appropriate use for the purposes set forth in this part.

PART C—VETERANS' EMPLOYMENT PROGRAMS

PROGRAMS AUTHORIZED

29 USC 1721.

SEC. 441. (a)(1) The Secretary shall conduct, directly or through grant or contract, programs to meet the employment and training needs of service-connected disabled veterans, veterans of the Vietnam era, and veterans who are recently separated from military service.

(2) Programs supported under this part may be conducted through public agencies and private nonprofit organizations, including recipients under other provisions of this Act that the Secretary determines have an understanding of the unemployment problems of such veterans, familiarity with the area to be served, and the capability to administer effectively a program of employment and training assistance for such veterans.

(3) Programs supported under this part shall include, but not be limited to—

(A) activities to enhance services provided veterans by other providers of employment and training services funded by Federal, State, or local government;

(B) activities to provide employment and training services to such veterans not adequately provided by other public employment and training service providers; and

(C) outreach and public information activities to develop and promote maximum job and job training opportunities for such veterans and to inform such veterans about employment, job-training, on-the-job training and educational opportunities under this Act, under title 38, United States Code, and under other provisions of law.

(b)(1) The Secretary shall administer programs supported under this part through the Assistant Secretary for Veterans' Employment.

(2) In carrying out responsibilities under this part, the Assistant Secretary for Veterans' Employment shall—

(A) be responsible for the awarding of grants and the distribution of funds under this part and for the establishment of appropriate fiscal controls, accountability, and program-performance standards for grant recipients under this part; and

(B) consult with the Administrator of Veterans' Affairs and take steps to ensure that programs supported under this part are coordinated, to the maximum extent feasible, with related programs and activities conducted under title 38, United States Code, including programs and activities conducted under subchapter IV of chapter 3 of such title, chapters 31 and 34 of such title, and sections 612A, 620A, 1787, and 2003A of such title.

38 USC 240, 1501 *et seq.*, 1651 *et seq.*, 612A, 620A, 1787, 2003A.

PART D—NATIONAL ACTIVITIES

MULTISTATE PROGRAMS

SEC. 451. (a) Funds available to carry out this section shall be used for job training programs or services (as authorized under any other provision of this Act) which are most appropriately administered at the national level and which are operated in more than one State.

29 USC 1731.

(b) Programs which are most appropriately administered at the national level include programs such as—

(1) programs addressed to industry-wide skill shortages;

(2) programs designed to train workers for employment opportunities located in another State;

(3) regional or nationwide efforts to develop a labor force with skills that promote the use of renewable energy technologies, energy conservation, and the weatherization of homes occupied by low-income families;

(4) programs designed to develop information networks among local programs with similar objectives under this Act; and

(5) programs which require technical expertise available at the national level and which serve specialized needs of particular client groups, including offenders, individuals of limited English language proficiency, handicapped individuals, women, single parents, displaced homemakers, youth, older workers, individuals who lack education credentials, public assistance recipients, and other individuals whom the Secretary determines require special assistance.

RESEARCH AND DEMONSTRATION

SEC. 452. (a) To assist the Nation in expanding work opportunities and assuring access to those opportunities for all who desire it, the Secretary shall establish a comprehensive program of employment and training research, utilizing the methods, techniques, and knowledge of the behavioral and social sciences and such other methods, techniques, and knowledge as will aid in the solution of the Nation's

29 USC 1732.

employment and training problems. The program under this section may include studies concerning the development or improvement of Federal, State, local, and privately supported employment and training programs; labor market processes and outcomes; policies and programs to reduce unemployment and the relationships thereof with price stability and other national goals; productivity of labor; improved means of forecasting and using forecasts of labor supply and demand at the national and subnational levels; methods of improving the wages and employment opportunities of low-skilled and disadvantaged workers; measuring and developing policies to eliminate worker shortages; and easing the transition from school to work, from transfer payment receipt to self-sufficiency, from one job to another, and from work to retirement.

(b) The Secretary shall establish a program of experimental, developmental, and demonstration projects, through grants or contracts, for the purpose of improving techniques and demonstrating the effectiveness of specialized methods in meeting employment and training problems. Research activities may include studies, experiments, demonstrations, and pilot projects in such areas as easing the transition from school to work, assessing the changing demographics of the American work-force and addressing the short-term and long-term impact of the changes, increasing employment of skilled workers critical to defense readiness, and, subject to the last sentence of this subsection, projects developed in conjunction with the Secretary of Defense to meet civilian manpower needs on military installations and in the private sector, and eliminating artificial barriers to employment. The Secretary may pay not to exceed 60 percent of the costs of projects developed in conjunction with the Secretary of Defense described in the preceding sentence, and the contributions of the Department of Defense may be in cash or in kind, fairly evaluated, including plant, equipment, or services.

PILOT PROJECTS

29 USC 1733.

Sec. 453. (a) From funds made available under this part, the Secretary may provide financial assistance for pilot projects which meet the employment-related needs of persons including the handicapped and displaced homemakers who face particular disadvantages in specific and general labor markets or occupations and other persons whom the Secretary determines require special assistance, and projects designed to address skill shortages that affect other critical national objectives, including national security.

(b) Each pilot project assisted under this section shall be designed to assist in eliminating artificial and other employment barriers faced by such persons.

(c) No project under this section shall be financially assisted for more than three years under this Act.

Applications.

(d) In selecting recipients under this section, the Secretary shall give special consideration to applications submitted by community-based organizations of demonstrated effectiveness, as well as to labor unions, and trade associations and their affiliates that address nationwide concerns through programs operating in more than one State.

EVALUATION

29 USC 1734.

SEC. 454. (a) The Secretary shall provide for the continuing evaluation of all programs, activities, and research and demonstration projects conducted pursuant to this Act, including their cost-effectiveness in achieving the purposes of this Act, their impact on communities and participants, their implication for related programs, the extent to which they meet the needs of persons by age, sex, race, and national origin, and the adequacy of the mechanism for the delivery of services.

42 USC 401.

(b) The Secretary shall evaluate the effectiveness of programs authorized under this Act and part C of title II of the Social Security Act with respect to the statutory goals, the performance standards established by the Secretary, and of increases in employment and earnings for participants, reduced income support costs, increased tax revenues, duration in training and employment situations, information on the post-enrollment labor market experience of program participants for at least a year following their termination from such programs, and comparable information on other employees or trainees of participating employers.

TRAINING AND TECHNICAL ASSISTANCE

29 USC 1735.

SEC. 455. (a) The Secretary, in consultation with appropriate officials, shall provide directly or through grants, contracts, or other arrangements, appropriate preservice and inservice training for specialized, supportive, supervisory, or other personnel, including job skills teachers, and appropriate technical assistance (including technical assistance to training programs for housing for migrant and seasonal farmworkers) with respect to programs under this Act, including the development and attainment of performance goals. Such activities may include the utilization of training and technical assistance capabilities which exist at the State and service delivery area level.

Information disclosure.

(b) The Secretary shall establish a national clearinghouse to disseminate materials and information gained from exemplary program experience which may be of use in the innovation or improvement of other programs conducted pursuant to this Act.

PART E—LABOR MARKET INFORMATION

LABOR MARKET INFORMATION; AVAILABILITY OF FUNDS

29 USC 1751.

SEC. 461. (a) The Secretary shall set aside, out of sums available to the Department for any fiscal year including sums available for this title, such sums as may be necessary to maintain a comprehensive system of labor market information on a national, regional, State, local, or other appropriate basis, which shall be made publicly available in a timely fashion.

(b) Funds available for purposes of this part shall also be available for purposes of section 125 (relating to State labor market information).

(c) Notwithstanding any other provision of law, funds available to other Federal agencies for carrying out chapter 35 of title 44, United States Code, the Vocational Education Act of 1963, and the Act of June 6, 1933 (popularly known as the Wagner-Peyser Act), may be

44 USC 3501 *et seq.*; 20 USC 2301 note; 29 USC 49 note.

made available by the head of each such agency to assist in carrying out the provisions of this part.

COOPERATIVE LABOR MARKET INFORMATION PROGRAM

29 USC 1752.

SEC. 462. (a) The Secretary shall develop and maintain for the Nation, State, and local areas, current employment data by occupation and industry, based on the occupational employment statistics program, including selected sample surveys, and projections by the Bureau of Labor Statistics of employment and openings by occupation.

(b) The Secretary shall maintain descriptions of job duties, training and education requirements, working conditions, and characteristics of occupations.

(c) In carrying out the provisions of this section, the Secretary shall assure that—

(1) departmental data collecting and processing systems are consolidated to eliminate overlap and duplication;

44 USC 3501 *et seq.*

(2) the criteria of chapter 35 of title 44, United States Code, are met; and

(3) standards of statistical reliability and national standardized definitions of employment, unemployment, and industrial and occupational definitions are used.

(d)(1) The Secretary is authorized to develop data for an annual statistical measure of labor market related economic hardship in the Nation. Among the factors to be considered in developing such a measure are unemployment, labor force participation, involuntary part-time employment, and full-time employment at wages less than the poverty level.

(2) The Secretary is authorized to develop and maintain, on national, State, local, and other appropriate bases, household budget data at different levels of living, including a level of adequacy, to reflect the differences of household living costs in regions and localities, both urban and rural.

Report.

(3) The Secretary shall publish, at least annually, a report relating labor force status to earnings and income.

(e) The Secretary shall develop and maintain statistical data relating to permanent lay-offs and plant closings. The Secretary shall publish a report based upon such data, as soon as practicable, after the end of each calendar year. Among the data to be included are—

(1) the number of such closings;
(2) the number of workers displaced;
(3) the location of the affected facilities; and
(4) the types of industries involved.

SPECIAL FEDERAL RESPONSIBILITIES

29 USC 1753.

20 USC 2391.

SEC. 463. (a) The Secretary, in cooperation with the Secretary of Commerce, the Secretary of Defense, the Secretary of the Treasury, the Secretary of Education, and the Director of the Office of Management and Budget, through the National Occupational Information Coordinating Committee established under section 161(b) of the Vocational Education Act of 1963, shall—

(1) review the need for and the application of all operating national data collection and processing systems in order to identify gaps, overlap, and duplications, and integrate at the

national level currently available data sources in order to improve the management of information systems;

(2) maintain, assure timely review, and implement national standardized definitions with respect to terms, geographic areas, timing of collection, and coding measures, to the maximum extent feasible; and

(3) provide technical assistance to the States in the development, maintenance, and utilization of labor market/occupational supply and demand information systems and projections of supply and demand as described in section 125, with special emphasis on assistance in the utilization of cost-efficient automated systems and improving access of individuals to career opportunities information in local and State labor markets.

(b) The Secretary, in cooperation with the Secretary of Defense, shall assure the development of an integrated occupational supply and demand information system to be used by States and, in particular, in secondary and postsecondary educational institutions in order to assure young persons adequate information on career opportunities in the Armed Forces.

(c) The Secretary and the Director of the Office of Management and Budget shall assure that, from the funds reserved for this part, sufficient funds are available to provide staff at the Federal level to assure the coordination functions described in this section.

NATIONAL OCCUPATIONAL INFORMATION COORDINATING COMMITTEE

SEC. 464. (a)(1) Of the amounts available for this part, not more than $5,000,000 is authorized to be reserved for the National Occupational Information Coordinating Committee (established pursuant to section 161(b) of the Vocational Education Act of 1963). 29 USC 1754. 20 USC 2391.

(2) In addition to the members required by such Act, the Committee shall include the Assistant Secretary of Commerce for Economic Development and the Assistant Secretary of Defense for Manpower, Reserve Affairs, and Logistics.

(3) Not less than 75 percent of the funds transferred by the Secretary to the National Occupational Information Coordinating Committee shall be used to support State occupational information coordinating committees and other organizational units designated under section 125 for carrying out State labor market information programs.

(b) In addition to its responsibilities under the Vocational Education Act of 1963, the National Occupational Information Coordinating Committee shall—

(1) carry out the provisions of section 463;

(2) give special attention to the labor market information needs of youth and adults, including activities such as (A) assisting and encouraging States to adopt methods of translating national occupational outlook information into State and local terms; (B) assisting and encouraging the development of State occupational information systems, including career information delivery systems and the provision of technical assistance for programs of on-line computer systems and other facilities to provide career information at sites such as local schools, public employment service offices, and job training programs authorized under this Act; (C) in cooperation with educational agencies and institutions, encouraging programs providing career information, counseling, and employment services for

postsecondary youth; and (D) in cooperation with State and local correctional agencies, encouraging programs of counseling and employment services for youth and adults in correctional institutions;

(3) provide training and technical assistance, and continuing support to State occupational information coordinating committees, in the development, maintenance, and use of occupational supply and demand information systems, with special emphasis on the use of cost efficient automated systems for delivering occupational information to planners and administrators of education and training programs and on improving the access of such planners and administrators to occupational information systems;

Report. (4) publish at least annually a report on the status of occupational information capabilities at the State and national levels, which may include recommendations for improvement of occupational information production and dissemination capabilities;

(5) conduct research and demonstration projects designed to improve any aspect of occupational and career information systems;

(6) provide technical assistance for programs designed to encourage public and private employers to list all available job opportunities with occupational information and career counseling programs conducted by administrative entities and with local public employment service offices and to encourage cooperation and contact among such employers and such administrative entities and public employment service offices; and

(7) providing assistance to units of general local government and private industry councils to familiarize them with labor market information resources available to meet their needs.

(c) All funds available to the National Occupational Information Coordinating Committee under this Act, under section 161 of the Vocational Education Act of 1963, and under section 12 of the Career Education Act may be used by the Committee to carry out any of its functions and responsibilities authorized by law. 20 USC 2391.

JOB BANK PROGRAM

29 USC 1755. Sec. 465. The Secretary is authorized to establish and carry out a nationwide computerized job bank and matching program (including the listing of all suitable employment openings with local offices of the State employment service agencies by Federal contractors and subcontractors and providing for the affirmative action as required by section 2012(a) of title 38, United States Code, on a regional, State, and local basis, using electronic data processing and telecommunications systems to the maximum extent possible for the purpose of identifying sources of available individuals and job vacancies, providing an expeditious means of matching the qualifications of unemployed, underemployed, and economically disadvantaged individuals with employer requirements and job opportunities, and referring and placing such individuals in jobs. An occupational information file may be developed, containing occupational projections of the numbers and types of jobs on regional, State, local, and other appropriate bases, as well as labor supply information by occupation.

PART F—NATIONAL COMMISSION FOR EMPLOYMENT POLICY

STATEMENT OF PURPOSE

29 USC 1771.

SEC. 471. The purpose of this part is to establish a National Commission for Employment Policy which shall have the responsibility for examining broad issues of development, coordination, and administration of employment and training programs, and for advising the President and the Congress on national employment and training issues. For the purpose of providing funds for the Commission, the Secretary shall reserve $2,000,000 of the sums appropriated for this title for each fiscal year.

COMMISSION ESTABLISHED

29 USC 1772.

Membership.

SEC. 472. (a) There is established a National Commission for Employment Policy (hereinafter in this part referred to as the "Commission"). The Commission shall be composed of 15 members, appointed by the President. The members of the Commission shall be individuals who are nationally prominent and the Commission shall be broadly representative of agriculture, business, labor, commerce, education (including elementary, secondary, postsecondary, and vocational and technical education), veterans, current State and local elected officials, community-based organizations, assistance programs, and members of the general public with expertise in human resource development or employment and training policy. One of the members shall be a representative of the National Advisory Council on Vocational Education (established under section 162 of the Vocational Education Act of 1963). The membership of the Commission shall be generally representative of significant segments of the labor force, including women and minority groups.

20 USC 2392.

Term of Office.

(b) The term of office of each member of the Commission appointed by the President under subsection (a) shall be three years, except that—

(1) any such member appointed to fill a vacancy shall serve for the remainder of the term for which his predecessor was appointed, and

(2) of such members first taking office—

(A) five shall serve for terms of one year;

(B) five shall serve for terms of two years; and

(C) five shall serve for terms of three years;

as designated by the President at the time of appointment.

(c)(1) The Chairman shall be selected by the President.

Meetings.

(2) The Commission shall meet not fewer than three times each year at the call of the Chairman.

(3) A majority of the members of the Commission shall constitute a quorum, but a lesser number may conduct hearings. Any recommendation may be passed only by a majority of the members present. Any vacancy in the Commission shall not affect its powers but shall be filled in the same manner in which the original appointment was made.

(d) The Chairman (with the concurrence of the Commission) shall appoint a Director, who shall be chief executive officer of the Commission and shall perform such duties as are prescribed by the Chairman.

FUNCTIONS OF THE COMMISSION

29 USC 1773. Sec. 473. The Commission shall—

(1) identify the employment goals and needs of the Nation, and assess the extent to which employment and training, vocational education, institutional training, vocational rehabilitation, economic opportunity programs, public assistance policies, employment-related tax policies, labor exchange policies, and other policies and programs under this Act and related Acts represent a consistent, integrated, and coordinated approach to meeting such needs and achieving such goals;

(2) develop and make appropriate recommendations designed to meet the needs and goals described in clause (1);

(3) examine and evaluate the effectiveness of federally assisted employment and training programs (including programs assisted under this Act), with particular reference to the contributions of such programs to the achievement of objectives sought by the recommendations made under clause (2);

(4) advise the Secretary on the development of national performance standards and the parameters of variations of such standards for programs conducted pursuant to this Act;

(5) evaluate the impact of tax policies on employment and training opportunities;

(6) examine and evaluate major Federal programs which are intended to, or potentially could, contribute to achieving major objectives of existing employment and training and related legislation or the objectives set forth in the recommendations of the Commission, and particular attention shall be given to the programs which are designed, or could be designed, to develop information and knowledge about employment and training problems through research and demonstration projects or to train personnel in fields (such as occupational counseling, guidance, and placement) which are vital to the success of employment and training programs;

(7)(A) identify, after consultation with the National Advisory Council on Vocational Education, the employment and training and vocational education needs of the Nation and assess the extent to which employment and training, vocational education, rehabilitation, and other programs assisted under this and related Acts represent a consistent, integrated, and coordinated approach to meeting such needs; and

Reports. (B) comment, at least once annually, on the reports of the National Advisory Council on Vocational Education, which comments shall be included in one of the reports submitted by the National Commission pursuant to this title and in one of the reports submitted by the National Advisory Council on Vocational Education pursuant to section 162 of the Vocational Education Act of 1963;

20 USC 2392. Recommendations. (8) study and make recommendations on how, through policies and actions in the public and private sectors, the Nation can attain and maintain full employment, with special emphasis on the employment difficulties faced by the segments of the labor force that experience differentially high rates of unemployment;

(9) identify and assess the goals and needs of the Nation with respect to economic growth and work improvements, including conditions of employment, organizational effectiveness and effi-

ciency, alternative working arrangements, and technological changes;

(10) evaluate the effectiveness of training provided with Federal funds in meeting emerging skill needs; and

Recommendations.

(11) study and make recommendations on the use of advanced technology in the management and delivery of services and activities conducted under this Act.

ADMINISTRATIVE PROVISIONS

29 USC 1774.

Sec. 474. (a) Subject to such rules and regulations as may be adopted by the Commission, the Chairman is authorized to—

Regulations.

(1) prescribe such rules and regulations as may be necessary;

(2) appoint and fix the compensation of such staff personnel as the Chairman deems necessary, and without regard to the provisions of title 5, United States Code, governing appointments in the competitive service, and without regard to the provisions of chapter 51 and subchapter III of chapter 53 of such title, relating to classification and the General Schedule pay rates, appoint not to exceed five additional professional personnel;

5 USC 5101 *et seq.*, 5331.

(3) procure the services of experts and consultants in accordance with section 3109 of title 5, United States Code;

(4) accept voluntary and uncompensated services of professional personnel, consultants, and experts, notwithstanding any other provision of law;

(5) accept in the name of the United States and employ or dispose of gifts or bequests to carry out the functions of the Commission under this title;

(6) enter into contracts and make such other arrangements and modifications, as may be necessary;

(7) conduct such studies, hearings, research activities, demonstration projects, and other similar activities as the Commission deems necessary to enable the Commission to carry out its functions under this title;

(8) use the services, personnel, facilities, and information of any department, agency, and instrumentality of the executive branch of the Federal Government and the services, personnel, facilities, and information of State and local public agencies and private research agencies, with the consent of such agencies, with or without reimbursement therefor; and

(9) make advances, progress, and other payments necessary under this Act without regard to the provisions of section 3648 of the Revised Statutes (31 U.S.C. 529).

(b) Upon request made by the Chairman of the Commission, each department, agency, and instrumentality of the executive branch of the Federal Government is authorized and directed to make its services, personnel, facilities, and information (including computer-time, estimates, and statistics) available to the greatest practicable extent to the Commission in the performance of its functions under this Act.

REPORTS

29 USC 1775.

Sec. 475. The Commission shall make at least annually a report of its findings and recommendations to the President and to the Congress. The Commission may make such interim reports or recommendations to the Congress, the President, the Secretary, or to the heads of other Federal departments and agencies, and in such form, as it may deem desirable. The Commission shall include in any report made under this section any minority or dissenting views submitted by any member of the Commission.

PART G—TRAINING TO FULFILL AFFIRMATIVE ACTION OBLIGATIONS

AFFIRMATIVE ACTION

29 USC 1781.
3 CFR
1964-1965
Comp., p. 339.

SEC. 481. (a) A contractor subject to the affirmative action obligations of Executive Order 11246, as amended, issued September 24, 1965, may establish or participate in training programs pursuant to this section for individuals meeting the eligibility criteria established in sections 203(a)(1), 401, and 402, which are designed to assist such contractors in meeting the affirmative action obligations of such Executive order. To qualify under this section, such a training program shall contain—

(1) a description of the jobs in the contractor's work force or in the service delivery area, for which the contractor has determined there is a need for training;

(2) a description of the recruiting, training, or other functions that the contractor, or the organization that will be engaged to perform the training, will perform and the steps that will be taken to insure that eligible individuals will—

(A) be selected for participation in training,
(B) be trained in necessary skills, and
(C) be referred for job openings,

in accordance with the objectives of such Executive order;

(3) whenever an organization other than the contractor will perform the training, a description of the demonstrated effectiveness of the organization as a provider of employment and training services;

(4) a description of how the contractor will monitor the program to keep an accurate accounting of all trainees, including (A) whether the trainees successfully complete the training program, and (B) whether the trainees are or are not placed; and

(5) an estimation of the cost of the program and an assurance that the contractor will assume all costs of the program or the pro rata share of costs to the contractor of the program.

(b)(1)(A) If the training proposal is designed to meet the needs of the community rather than, or in addition to, the employment needs of the contractor, and has not been approved by another Federal agency, the program shall be submitted to the private industry council established under section 102 for a determination that there is a need for such training in the community.

(B) Individuals trained under any program satisfying the requirements of this section may be included by the private industry council in its performance accomplishments and the wage gains of such individuals shall be included in determining the compliance of the job training program of the private industry council with applicable standards.

Regulations.

(2) The Director of the Office of Federal Contract Compliance Programs, Department of Labor, shall promulgate regulations setting forth how the Office will determine, during a compliance review, the degree to which a training program will satisfy the

contractor's affirmative action obligations. The training and placement of trainees with employers other than the contractor may be considered in evaluating such contractor's overall good faith efforts, but in no event may placement of trainees with employers other than the contractor be permitted to affect that contractor's affirmative action obligations respecting its work force. The content of the training program will not be subject to review or regulation by the Office of Federal Contract Compliance Programs. If during a compliance review the Director of the Office of Federal Contract Compliance Programs determines that a training program does not comply with its regulations, the Director shall—

Compliance review.

(A) notify the contractor of the disapproval,

(B) set forth the reasons for the disapproval, and

(C) provide a list of recommendations which, if accepted, will qualify the training program under this section.

(3) A contractor who has a training program which contains the criteria set forth in subsection (a) and which is in accordance with regulations promulgated under paragraph (2) of this subsection shall continue to meet the affirmative action obligations of Executive Order 11246, as amended, but the contractors required to maintain a written affirmative action program need only maintain an abbreviated affirmative action program, the content and length of which shall be determined by the Director of the Office of Federal Contract Compliance Programs, to satisfy the written affirmative action program portion of their obligations under Executive Order 11246, as amended. Successful performance or operation of a training program meeting the criteria set forth in subsection (a) shall create a presumption that the contractor has made a good faith effort to meet its affirmative action obligations to the degree specified by the Director under paragraph (2) of this subsection, but that presumption shall not be applicable to the satisfaction of other affirmative action obligations not directly related to the training and hiring requirements of this section, or other affirmative action obligations not affected by this section. For the purpose of the preceding sentence, "successful performance or operation" means training and placing in jobs a number of individuals which bears a reasonable relationship to the number of job openings in the contractors's facilities or in the relevant labor market area.

3 CFR, 1964-1965 Comp., p. 339.

"Successful performance or operation."

(c) Nothing in this section may be interpreted—

(1) to compel contractor involvement in such programs,

(2) to establish the exclusive criteria by which a contractor can be found to have fulfilled its affirmative action obligations,

(3) to provide authority for imposing any additional obligations on contractors not participating in such training activities,

(4) to permit the Office of Federal Contract Compliance Programs to intervene or interfere with the authority and responsibilities of the private industry councils,

(5) to restrict or limit the authority of the Secretary to investigate the employment practices of any Government contractor, to initiate such investigation by the Director, to determine whether any nondiscrimination contractual provisions have been violated, or to enforce Executive Order 11246, or

3 CFR, 1964-1965 Comp., p. 339.

(6) to prohibit the Secretary or the Director, or other authorized officers of the United States, from requesting or compelling any contractor preparing and maintaining a short form affirmative action plan under subsection (b) to provide information necessary to conduct a compliance review or to provide data

3 CFR,1964–1965 Comp., p. 339.

necessary to determine whether any violation of Executive Order 11246 has occurred.

TITLE V—MISCELLANEOUS PROVISIONS

AMENDMENTS TO THE WAGNER-PEYSER ACT

Sec. 501. (a) The Act of June 6, 1933, known as the Wagner-Peyser Act (29 U.S.C. 49 et seq.), is amended by striking out all that precedes section 4 of such Act and inserting in lieu thereof the following:

29 USC 49.

"Section 1. In order to promote the establishment and maintenance of a national system of public employment offices, the United States Employment Service shall be established and maintained within the Department of Labor.

Definitions.
29 USC 49a.

"Sec. 2. For purposes of this Act—

Ante., p. 1322.

"(1) the term 'chief elected official or officials' has the same meaning given that term under the Job Training Partnership Act;

"(2) the term 'private industry council' has the same meaning given that term under the Job Training Partnership Act;

"(3) the term 'Secretary' means the Secretary of Labor;

"(4) the term 'service delivery area' has the same meaning given that term under the Job Training Partnership Act; and

"(5) the term 'State' means any of the several States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, and the Virgin Islands.

29 USC 49b.

"Sec. 3. (a) The United States Employment Service shall assist in coordinating the State public employment services throughout the country and in increasing their usefulness by developing and prescribing minimum standards of efficiency, assisting them in meeting problems peculiar to their localities, promoting uniformity in their administrative and statistical procedure, furnishing and publishing information as to opportunities for employment and other information of value in the operation of the system, and maintaining a system for clearing labor between the States.

42 USC 601.
42 USC 651.

"(b) It shall be the duty of the Secretary of Labor to assure that unemployment insurance and employment service offices in each State, as appropriate, upon request of a public agency administering or supervising the administration of a State plan approved under part A of title IV of the Social Security Act or of a public agency charged with any duty or responsibility under any program or activity authorized or required under part D of title IV of such Act, shall (and, notwithstanding any other provision of law, is authorized to) furnish to such agency making the request, from any data contained in the files of any such office, information with respect to any individual specified in the request as to (1) whether such individual is receiving, has received, or has made application for, unemployment compensation, and the amount of any such compensation being received by such individual, (2) the current (or most recent) home address of such individual, and (3) whether such individual has refused an offer of employment and, if so, a description of the employment so offered and the terms, conditions, and rate of pay therefor.".

29 USC 49d.

(b) Section 5 of such Act is amended by striking out subsection (b) and inserting in lieu thereof the following new subsections:

"(b) The Secretary shall from time to time certify to the Secretary of the Treasury for payment to each State which—

"(1) except in the case of Guam, has an unemployment compensation law approved by the Secretary under the Federal Unemployment Tax Act and is found to be in compliance with section 303 of the Social Security Act, as amended,

26 USC 3311.
42 USC 503.

"(2) is found to have coordinated the public employment services with the provision of unemployment insurance claimant services, and

"(3) is found to be in compliance with this Act,

such amounts as the Secretary determines to be necessary for allotment in accordance with section 6.

Appropriation availability.

"(c)(1) Beginning with fiscal year 1985 and thereafter appropriations for any fiscal year for programs and activities assisted or conducted under this Act shall be available for obligation only on the basis of a program year. The program year shall begin on July 1 in the fiscal year for which the appropriation is made.

"(2) Funds obligated for any program year may be expended by the State during that program year and the two succeeding program years and no amount shall be deobligated on account of a rate of expenditure which is consistent with the program plan.

Appropriation availability.

"(3)(A) Appropriations for fiscal year 1984 shall be available both to fund activities for the period between October 1, 1983, and July 1, 1984, and for the program year beginning July 1, 1984.

Appropriation authorization.

"(B) There are authorized to be appropriated such additional sums as may be necessary to carry out the provisions of this paragraph for the transition to program year funding.".

(c) Such Act is amended by adding at the end of section 5 the following new sections:

Allotments.
29 USC 49e.

"Sec. 6. (a) From the amounts appropriated pursuant to section 5 for each fiscal year, the Secretary shall first allot to Guam and the Virgin Islands an amount which, in relation to the total amount available for the fiscal year, is equal to the allotment percentage which each received of amounts available under this Act in fiscal year 1983.

"(b)(1) Subject to paragraphs (2), (3), and (4) of this subsection, the Secretary shall allot the remainder of the sums appropriated and certified pursuant to section 5 of this Act for each fiscal year among the States as follows:

"(A) two-thirds of such sums shall be allotted on the basis of the relative number of individuals in the civilian labor force in each State as compared to the total number of such individuals in all States; and

"(B) one-third of such sums shall be allotted on the basis of the relative number of unemployed individuals in each State as compared to the total number of such individuals in all States.

For purposes of this paragraph, the number of individuals in the civilian labor force and the number of unemployed individuals shall be based on data for the most recent calendar year available, as determined by the Secretary of Labor.

"(2) No State's allotment under this section for any fiscal year shall be less than 90 percent of its allotment percentage for the fiscal year preceding the fiscal year for which the determination is made. For the purpose of this section, the Secretary shall determine the allotment percentage for each State (including Guam and the Virgin Islands) for fiscal year 1984 which is the percentage that the State received under this Act for fiscal year 1983 of the total amounts available for payments to all States for such fiscal year. For each succeeding fiscal year, the allotment percentage for each such State shall be the percentage that the State received under this Act for the preceding fiscal year of the total amounts available for allotments for all States for such fiscal year.

"(3) For each fiscal year, no State shall receive a total allotment under paragraphs (1) and (2) which is less than 0.28 percent of the total amount available for allotments for all States.

"(4) The Secretary shall reserve such amount, not to exceed 3 percent of the sums available for allotments under this section for each fiscal year, as shall be necessary to assure that each State will have a total allotment under this section sufficient to provide staff and other resources necessary to carry out employment service activities and related administrative and support functions on a statewide basis.

Planning estimates. "(5) The Secretary shall, not later than March 15 of fiscal year 1983 and each succeeding fiscal year, provide preliminary planning estimates and shall, not later than May 15 of each such fiscal year, provide final planning estimates, showing each State's projected allocation for the following year.

29 USC 49f. "Sec. 7. (a) Ninety percent of the sums allotted to each State pursuant to section 6 may be used—

"(1) for job search and placement services to job seekers including counseling, testing, occupational and labor market information, assessment, and referral to employers;

"(2) for appropriate recruitment services and special technical services for employers; and

"(3) for any of the following activities:

"(A) evaluation of programs;

"(B) developing linkages between services funded under this Act and related Federal or State legislation, including the provision of labor exchange services at education sites;

"(C) providing services for workers who have received notice of permanent layoff or impending layoff, or workers in occupations which are experiencing limited demand due to technological change, impact of imports, or plant closures;

"(D) developing and providing labor market and occupational information;

"(E) developing a management information system and compiling and analyzing reports therefrom; and

"(F) administering the work test for the State unemployment compensation system and providing job finding and placement services for unemployment insurance claimants.

"(b) Ten percent of the sums allotted to each State pursuant to section 6 shall be reserved for use in accordance with this subsection by the Governor of each such State to provide—

"(1) performance incentives for public employment service offices and programs, consistent with performance standards established by the Secretary, taking into account direct or indirect placements (including those resulting from self-directed job search or group job search activities assisted by such offices or programs), wages on entered employment, retention, and other appropriate factors;

"(2) services for groups with special needs, carried out pursuant to joint agreements between the employment service and the appropriate private industry council and chief elected official or officials or other public agencies or private nonprofit organizations; and

"(3) the extra costs of exemplary models for delivering services of the types described in subsection (a).

"(c) In addition to the services and activities otherwise authorized by this Act, the United States Employment Service or any State agency designated under this Act may perform such other services and activities as shall be specified in contracts for payment or reimbursement of the costs thereof made with the Secretary of Labor or with any Federal, State, or local public agency, or administrative entity under the Job Training Partnership Act, or private nonprofit organization.". *Ante*, p. 1322.

(d) Section 8 of such Act is amended— Plans. 29 USC 49g.

(1) by striking out "Director" each place it appears and inserting in lieu thereof "Secretary of Labor";

(2) by designating the first sentence thereof as subsection (a);

(3) by designating the second and third sentences thereof as subsection (d);

(4) by designating the fourth sentence thereof as subsection (e); and

(5) by inserting after subsection (a) as amended by clause (1) of this subsection the following subsections:

"(b) Prior to submission of such plans to the Secretary—

"(1) the employment service shall develop jointly with each appropriate private industry council and chief elected official or officials for the service delivery area (designated under the Job Training Partnership Act) those components of such plans applicable to such area;

"(2) such plans shall be developed taking into consideration proposals developed jointly by the appropriate private industry council and chief elected official or officials in the service delivery area affected;

"(3) such plans shall be transmitted to the State job training coordinating council (established under such Act) which shall certify such plans if it determines (A) that the components of such plans have been jointly agreed to by the employment service and appropriate private industry council and chief elected official or officials; and (B) that such plans are consistent with the Governor's coordination and special services plan under the Job Training Partnership Act;

"(4) if the State job training coordinating council does not certify that such plans meet the requirements of clauses (A) and (B) of paragraph (3), such plans shall be returned to the employment service for a period of thirty days for it to consider, jointly with the appropriate private industry council and chief elected official or officials, the council's recommendations for modifying such plans; and

"(5) if the employment service and the appropriate private industry council and chief elected official or officials fail to reach agreement upon such components of such plans to be submitted finally to the Secretary, such plans submitted by the State agency shall be accompanied by such proposed modifications as may be recommended by any appropriate disagreeing private industry council and chief elected official or officials affected, and the State job training coordinating council shall transmit to the Secretary its recommendations for resolution thereof.

Review

"(c) The Governor of the State shall be afforded the opportunity to review and transmit to the Secretary proposed modifications of such plans submitted.";

29 USC 49h.

(e) Section 9 of such Act is amended to read as follows:

"Sec. 9. (a)(1) Each State shall establish such fiscal control and fund accounting procedures as may be necessary to assure the proper disbursal of, and accounting for, Federal funds paid to the recipient under this Act. The Director of the Office of Management and Budget, in consultation with the Comptroller General of the United States, shall establish guidance for the proper performance of audits. Such guidance shall include a review of fiscal controls and fund accounting procedures established by States under this section.

Audit.

"(2) At least once every two years, the State shall prepare or have prepared an independent financial and compliance audit of funds received under this Act.

"(3) Each audit shall be conducted in accordance with applicable auditing standards set forth in the financial and compliance element of the Standards for Audit of Governmental Organizations, Programs, Activities, and Functions issued by the Comptroller General of the United States.

Report to Congress.

"(b)(1) The Comptroller General of the United States shall evaluate the expenditures by States of funds received under this Act in order to assure that expenditures are consistent with the provisions of this Act and to determine the effectiveness of the State in accomplishing the purposes of this Act. The Comptroller General shall conduct evaluations whenever determined necessary and shall periodically report to the Congress on the findings of such evaluations.

"(2) Nothing in this Act shall be deemed to relieve the Inspector General of the Department of Labor of his responsibilities under the Inspector General Act.

Information availability.

"(3) For the purpose of evaluating and reviewing programs established or provided for by this Act, the Comptroller General shall have access to and the right to copy any books, accounts, records, correspondence, or other documents pertinent to such programs that are in the possession, custody, or control of the State.

Funds, repayment.

"(c) Each State shall repay to the United States amounts found not to have been expended in accordance with this Act. No such finding shall be made except after notice and opportunity for a fair hearing. The Secretary may offset such amounts against any other amount to which the recipient is or may be entitled under this Act.".

29 USC 49i.

(f) Section 10 of such Act is amended to read as follows:

"Sec. 10. (a) Each State shall keep records that are sufficient to permit the preparation of reports required by this Act and to permit the tracing of funds to a level of expenditure adequate to insure that the funds have not been spent unlawfully.

Investigations.

"(b)(1) The Secretary may investigate such facts, conditions, practices, or other matters which the Secretary finds necessary to determine whether any State receiving funds under this Act or any official of such State has violated any provision of this Act.

"(2)(A) In order to evaluate compliance with the provisions of this Act, the Secretary shall conduct investigations of the use of funds received by States under this Act.

"(B) In order to insure compliance with the provisions of this Act, the Comptroller General of the United States may conduct investigations of the use of funds received under this Act by any State.

"(3) In conducting any investigation under this Act, the Secretary or the Comptroller General of the United States may not request new compilation of information not readily available to such State.

"(c) Each State receiving funds under this Act shall—

"(1) make such reports concerning its operations and expenditures in such form and containing such information as shall be prescribed by the Secretary, and

"(2) establish and maintain a management information system in accordance with guidelines established by the Secretary designed to facilitate the compilation and analysis of programmatic and financial data necessary for reporting, monitoring, and evaluating purposes.".

Restrictions. 29 USC 49j.

(g) Section 11(a) of such Act is amended by adding at the end thereof the following new sentence: "Nothing in this section shall be construed to prohibit the Governor from carrying out functions of such State advisory council through the State job training coordinating council in accordance with section 122(c) of the Job Training Partnership Act.".

Ante, p. 1339.

(h) Such Act is amended by adding at the end thereof the following new sections:

Performance standards. 29 USC 49l

"Sec. 13. (a) The Secretary is authorized to establish performance standards for activities under this Act which shall take into account the differences in priorities reflected in State plans.

Restrictions.

"(b) Nothing in this Act shall be construed to prohibit the referral of any applicant to private agencies as long as the applicant is not charged a fee.

Appropriation authorization. 29 USC 49l-1.

"Sec. 14. There are authorized to be appropriated such sums as may be necessary to enable the Secretary to provide funds through reimburseable agreements with the States to operate statistical programs which are essential for development of estimates of the gross national product and other national statistical series, including those related to employment and unemployment.

29 USC 49 note

"Sec. 15. This Act may be cited as the 'Wagner-Peyser Act'.".

AMENDMENTS TO PART C OF TITLE IV OF THE SOCIAL SECURITY ACT

42 USC 632.

Sec. 502. (a) Section 432(d) of the Social Security Act is amended to read as follows:

"(d) In providing the training and employment services and opportunities required by this part, the Secretary of Labor shall, to the maximum extent feasible, assure that such services and opportunities are provided by using all authority available under this or any other Act. In order to assure that the services and opportunities so required are provided, the Secretary of Labor (1) shall assure, when appropriate, that registrants under this part are referred for training and employment services under the Job Training Partnership Act, and (2) may use the funds appropriated under this part to provide programs required by this part through such other Acts to the same extent and under the same conditions (except as regards the Federal matching percentage) as if appropriated under such other Act and, in making use of the programs of other Federal, State, or local agencies (public or private), the Secretary of Labor may reimburse such agencies for services rendered to individuals under this part to the extent that such services and opportunities are not otherwise available on a nonreimbursable basis.".

Ante, p. 1322.

42 USC 632.

(b)(1) Section 432(f) of such Act is amended—

(A) by amending paragraph (1) to read as follows:

"(f)(1) The Secretary of Labor shall utilize the services of each private industry council (as established under the Job Training Partnership Act) to identify and provide advice on the types of jobs available or likely to become available in the service delivery area of such council."; Ante, p. 1322.

(B) by striking out paragraph (2) and redesignating paragraph (3) as paragraph (2); and

(C) by striking out "Labor Market Advisory Council" in such paragraph and inserting in lieu thereof "private industry council".

42 USC 633. (2) Section 433(b)(2) of such Act is amended by striking out "Labor Market Advisory Council (established pursuant to section 432(f))" and inserting in lieu thereof "private industry council under the Job Training Partnership Act".

42 USC 632. (c)(1) Section 432(b)(1)(A) of such Act is amended by inserting before the comma at the end thereof the following: ", which may include intensive job search services, including participation in group job search activities".

42 USC 633. (2) Section 433(a) of such Act is amended by striking out "unemployed fathers" and inserting in lieu thereof "unemployed parents who are the principal earners (as defined in section 407)".

(3) Section 433 of such Act is amended by adding at the end thereof the following new subsection:

"(i) In planning for activities under this section, the chief executive officer of each State shall make every effort to coordinate such activities with activities provided by the appropriate private industry council and chief elected official or officials under the Job Training Partnership Act.".

EARNINGS DISREGARD

95 Stat. 843.
42 USC 602. SEC. 503. (a) Section 402(a)(8)(A) of the Social Security Act is amended—

(1) by striking out "and" at the end of clause (iii);

(2) in clause (iv), by striking out "already disregarded under the preceding provisions of this paragraph" and inserting in lieu thereof "disregarded under any other clause of this subparagraph"; and

(3) by adding at the end thereof the following new clause:

"(v) may disregard the income of any dependent child applying for or receiving aid to families with dependent children which is derived from a program carried out under the Job Training Partnership Act (as originally enacted), but only in such amounts, and for such period of time (not to exceed six months with respect to earned income) as the Secretary may provide in regulations; and".

95 Stat. 845.
42 USC 602. (b) Section 402(a)(18) of such Act is amended by inserting ", other than paragraph (8)(A)(v)" after "without application of paragraph (8)".

ENFORCEMENT OF MILITARY SELECTIVE SERVICE ACT

SEC. 504. The Secretary shall insure that each individual participating in any program established under this Act, or receiving any assistance or benefit under this Act, has not violated section 3 of the Military Selective Service Act (50 U.S.C. App. 453) by not presenting and submitting to registration as required pursuant to such section. The Director of the Selective Service System shall cooperate with the Secretary in carrying out this section. 29 USC 1504.

Approved October 13, 1982.

LEGISLATIVE HISTORY—S. 2036 (H.R. 5320)

HOUSE REPORTS: No. 97-537 accompanying H.R. 5320 (Comm. on Education and Labor), No. 97-889 (Comm. of Conference).
SENATE REPORT No. 97-469 (Comm. on Labor and Human Resources).
CONGRESSIONAL RECORD, Vol. 128 (1982):
  July 1, considered and passed Senate.
  Aug. 4, H.R. 5320 considered and passed Senate; S. 2036, amended, passed in lieu.
  Sept. 30, Senate agreed to conference report.
  Oct. 1, House agreed to conference report.
WEEKLY COMPILATION OF PRESIDENTIAL DOCUMENTS, Vol. 18, No. 41 (1982):
  Oct. 13, Presidential statement.

(insert APP I — 67AP)

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY
GEORGE DEUKMEJIAN, Governor

EMPLOYMENT DEVELOPMENT DEPARTMENT
800 Capitol Mall, Sacramento, CA 95814
(916) 445-4546

February 24, 1984

REFER TO: 69:1:ti

RECEIVED
FEB 28 1984
SUBCOMMITTEE ON
EMPLOYMENT OPPORTUNITIES

Honorable Augustus F. Hawkins, Chairman
Committee on Education and Labor
U. S. House of Representatives
B-346A Rayburn House Office Building
Washington, D. C. 20515

Dear Congressman Hawkins:

During hearing on implementation of the Job Training Partnership Act (JTPA) that was held in Los Angeles on February 14th, I was unable to adequately answer your question about our approval of the proposed Entered Employment Rate in the Los Angeles County Job Training Plan. At that time, you expressed concern that the target figure of 38.59% appeared to be inappropriately low and that it might represent a deviation from the regression formula approved by the Secretary of Labor.

The question was prompted by the fact that the Los Angeles County figure is substantially below the federal take-off point of 50.4%. Upon returning to the office, I had my staff recalculate the Los Angeles County entered employment rate using the regression formula provided by the Secretary of Labor. When we recalculated the rate based on the demographic mix of its planned participants, the entered employment target of the Los Angeles County SDA was 38.30%. Thus instead of being understated the goal contained in the Plan is very slightly overstated.

At the hearing you also asked that we provide you with statistics illustrating the operation of the program during the first quarter, October 1st to December 31, 1983. For your information, I have attached a statewide statistical roll-up which shows enrollments, terminations and entered employment for each of the key participant segments under the JTPA. We are pleased with the overall performance of the California Service Delivery Areas (SDAs), especially with the enrollment of 18,574 individuals, the employment of 3,123 or 70.8% of the 4,414 who have terminated. We are also pleased at the level of service that is being provided to AFDC recipients and school drop-outs. On the other hand, we are concerned with the level of service to veterans and are taking action to assist our SDAs to increase their service to veterans and are taking action to assist our SDAs to increase their services to this important segment.

I have also attached a copy of the approved Los Angeles County SDA Job Training Plan.

It was a pleasure to meet you again and to have the opportunity to describe for you the implementation of JTPA in California. I am sure that your attention to our program will assist us to administer it in an effective and efficient manner here in California.

Sincerely,

KARL W. GROSSENBACHER, Chief
Job Training Partnership Office

cc: Theo. A. Bruinsma
A. Brooks Firestone
A. Michael O'Reilly, #67
LLO, #32

JOB TRAINING PARTNERSHIP ACT

Statistical Rollup: Service Delivery Area Management Information
Period: October - December 1983

	Enrolled	Terminated	Employed	Placement Rate*
otal Participants	18,574	4,414	3,123	70.8%
dult	11,792	2,863	1,980	69.2%
outh	6,782	1,551	1,143	73.7%
ale	8,962	2,194	1,507	68.7%
male	9,612	2,220	1,616	72.8%
hite	6,635	1,709	1,214	71.0%
lack	4,395	885	597	67.5%
spanic	5,371	1,275	899	70.5%
ndicapped	1,198	311	217	69.8%
employment Insurance Claimant	1,411	341	238	69.8%
terans	869	253	182	71.9%
DC Recipients (Enrolled)	4,702	899	596	66.3%
ther Welfare (Enrolled)	6,407	1,339	819	61.2%
otal Welfare (Term, Employed)	11,109	2,238	1,415	63.2%
chool Dropout	4,540	1,119	691	61.8%

*The placement rate is a factor of the number of participants employed divided by the number terminated.

45337

JTPA
Interim Plan
and
Subgrant Agreement
October '83 through June '84

(1) REGISTRATION NO. 8[illegible] 1587

(2) MODIFICATION NO. ______

(3) NAME OF SDA: COUNTY OF LOS ANGELES

SUBGRANTOR
State of California
Employment Development Department
State Job Training Partnership Office
800 Capitol Mall, MIC 72
Sacramento, CA 95814

(4) SUBGRANTEE (SDA Grant Recipient)
Michael D. Antonovich, Chairman
Honorable Board of Supervisors
County of Los Angeles
383 Hall of Administration
500 West Temple Street
Los Angeles, California 90012

(5) This Subgrant Agreement is entered into by the State of California, Employment Development Department (E
the COUNTY OF LOS ANGELES, hereinafter the Subgrantee. The Subgrantee agrees
operate a program in accordance with the provisions of this cost reimbursement type Subgrant under the Jo
Training Partnership Act (JTPA). This X Subgrant ____ Modification consists of this sheet and those
following as designated with an "X", which are attached hereto and by this reference made a part hereof:

X General Provisions, Exhibit A, 8 pages;
X Standards of Conduct, Exhibit B, 1 pages;
X Program Narrative, Exhibit C, [illegible] pages;
__ Participant Program Plan, Exhibit D, 2 pages;
__ Budget Plan, Exhibit E, 1 pages;
X Private Industry Council and Chief Elected Official(s) Concurrence and Administration and Planning Agreem
Exhibit F, ____ pages;
__ Joint Powers Agreement(s), Exhibit G, 5 pages.

(6) FUNDING—The Subgrantor agrees to reimburse the Subgrantee not to exceed the amount listed herein after

PRIOR AMOUNT $ -0-
INCREASE/DECREASE $ -0-
TOTAL $ 12,481,553

(7) TERM—From 10-1-83 Through 6-30-84
(8) EFFECTIVE DATE OF AGREEMENT ______

(9) MODIFICATION—The purpose is: ______

(10) APPROVED FOR SUBGRANTOR
By Signature

Title

(11) APPROVED FOR SUBGRANTEE
By Signature

Title Michael D. Antonovich, Chairman
Board of Supervisors

I hereby certify that to my knowledge budgeted funds are available for the period and purpose of the expenditure stated above.

ATTEST: RICHARD A. SCHO
ASSISTANT EXECUTIVE OFFICER —
CLERK OF THE BOARD OF SUPERVIS
By Patricia Polk

RESOLUTION

This will certify that the Board of Supervisors of the County of Los Angeles has agreed by Board action dated AUG 16 1983 to accept a subgrant from the State of California, Employment Development Department, and has authorized the following officer identified by title to conduct needed negotiations and to sign all necessary documents and agreements.

(Specify by title only, not name)

Chairman, Board of Supervisors
Director, Department of Community Services

SIGNED:
Michael D. Antonovich
TITLE: Chairman, Board of Supervisors

ATTEST: RICHARD A. SCHOENI
ASSISTANT EXECUTIVE OFFICER —
CLERK OF THE BOARD OF SUPERVISORS
By Patricia Peck, Deputy

GENERAL PROVISIONS

A. BASIC PROVISIONS The following provisions apply to all Subgrantees:

1. The Subgrantee has been selected to receive funds under this program and shall provide services in and for the Service Delivery Area designated in this agreement in accordance with the provisions of this Subgrant Agreement and all exhibits attached hereto.

2. In its performance under this agreement the subgrantee shall fully comply with the requirements of:

   a. The Job Training Partnership Act (JTPA) Public Law 97-300, all federal regulations and Governor's policies and procedures issued pursuant to JTPA, and any new legislation, regulation, policy and procedures which may replace JTPA;

   b. The Family Economic Security Act (FESA), California Unemployment Insurance Code, Section 15000 et seq., to the extent permitted by federal law; all State regulations and Governor's policies and procedures issued pursuant to FESA; and any new legislation, regulation, policy and procedures which may replace FESA and;

   c. The terms and conditions of this agreement and all applicable federal, federal, State and local laws, regulations and policies.

3. If the regulations promulgated pursuant to JTPA or FESA are amended or revised, the Subgrantee will comply with such revisions or will notify the Employment Development Department (EDD) within 30 days after promulgation of the amendments or revision that it cannot so conform so that EDD may take appropriate action including termination of the subgrant, if necessary.

4. Funding of this subgrant is contingent on the availability of federal or State funds and continued federal or State authorization for program acivities, and is subject to amendment or termination due to lack of funds or authorization.

5. This subgrant is subject to modification and termination as necessary in accordance with requirements contained in any future federal or State legislation, regulations or policy.

6. In the event of any termination, all property, finished or unfinished documents, photographs, data, studies and reports or unused supplies prepared or purchased by the Subgrantee under this subgrant shall be disposed of in accordance with direction from EDD. In addition, any tools and/or equipment furnished to the subgrantee by EDD and/or purchased by the subgrantee with funds pursuant to this agreement shall be limited to use pursuant to this agreement and shall remain the property of the United States Government and/or State of California, EDD. Upon termination of this agreement, subgrantee shall immediately return such tools and/or equipment to EDD or dispose of them in accordance with the directions of EDD.

unless the property is described in Exhibit [illegible], Budget Plan, as property to be expended during the period of time before this agreement is terminated.

7. At the expiration of the term of this subgrant or upon termination prior to the expiration of the subgrant, funds not obligated for the purposes of this subgrant shall revert to EDD. (All obligations must be expended within two years of termination.)

8. Termination

   a. Subgrantee may terminate this subgrant upon ninety days written notice to EDD.

   b. EDD may terminate this subgrant upon written notice at such time and to such extent as funds are reduced or not made available to EDD by the U.S. Department of Labor or the California State Legislature.

9. Modification

   This subgrant may be amended only in writing by the mutual agreement of the parties hereto.

   a. Any modification to this subgrant, except 15 percent variation annually in the Budget Summary (Chart EI), Exhibit E or a 15 percent annual decrease in services to a participant category in the Participant Program Plan, Exhibit D, shall require the written approval of Subgrantor.

   b. Any modification affecting the SDA Plan in the manner described in Section 104(c) of JTPA is subject to approval as setforth in Section 105 of JTPA.

10. All notices of termination or modification may be personally delivered or may be delivered by deposit in the United States Postal Service, postage prepaid, and shall be deemed to have been given at the time of personal delivery, or of the date of deposit in the mail. Notices to the Subgrantee shall be addressed to:

    Mr. Donald G. Galloway, Director
    Department of Community Services
    3175 West Sixth Street
    Los Angeles, California 90020.

    Notices to EDD shall be addressed to:

    State Job Training Partnership Office
    800 Capitol Mall, MIC 69
    Sacramento, CAlifornia 95814

11. Cash Management

    a. In order to minimize the amount of time between the receipt of advanced funds and their subsequent disbursement, each subgrantee will time its request for cash to coincide with cash needs. Subgrantees will assure that no excess cash is on deposit.

Generally, if only sufficient cash is on deposit to cover approximately three day's average disbursements, EDD will not consider the amount to be excessive. In this regard, advances to subsubrecipients and/or contractors are not considered to be cash on hand for the subgrantee.

The subgrantee understands and agrees that failure to adhere to these provisions may result in the subgrantee being funded through a monthly reimbursement process.

b. To request funds, subgrantee may submit written requests or make telephone requests (verified by a subsequent written confirmation).

EDD will advance funds as needed to the subgrantee and will make every effort to assure funds are received when needed.

c. The Employment Development Department retains the authority to adjust specific amounts requested if EDD's records and subsequent verification with the subgrantee indicate that the subgrantee has an excessive amount of cash in its account.

12. Subgrantee shall establish such fiscal controls and fund accounting procedures as required by JTPA and State and federal regulations or as may be deemed necessary by the Governor to assure the proper disbursal of, and accounting for, federal funds paid to the subgrantee under the Job Training Partnership Act.

a. The Subgrantee shall comply with Federal Regulations 41 CFR 29-70.102, as they relate to charging direct and indirect costs.

b. EDD, the U.S. Department of Labor, the Office of the Inspector General and the Comptroller General shall have the right to observe, monitor and/or evaluate all conditions and activities in the Service Delivery Area, and to investigate, examine, and audit all records, books, papers or documents related to the conduct of programs funded by this subgrant.

c. The Subgrantee shall maintain such program and fiscal records and make such program statistical and fiscal reports as are required by EDD and/or the U.S. Department of Labor with regard to the Service Delivery Area. Subgrantee agrees to comply with procedures established by the Governor regarding timely completion and submission of required reports.

d. Subgrantee agrees to retain all records pertinent to all grants and agreements under the JTPA, including financial, statistical, property and participant records and supporting documentation for a period of three years from the date of obligation of funds. If at the end of three years there is ongoing litigation or an audit involving those records, the subgrantee will retain the records until the resolution of such litigation or audit.

13. Subgrantee will comply with policy and procedures established by the Governor with respect to the utilization of any income (including interest) generated as a result of the receipt of Job Training Partnership funds. The Subgrantee will account for this income separately and hold it in trust until directed by the Governor.

14. Subgrantee shall establish a management information system and a participant data system, as prescribed by the Governor. The participant data system will contain specific detail enough to demonstrate compliance with relevant eligibility criteria (including verification of eligibility), and to track the participants' progress for the purposes of measuring performance and, where appropriate, duration of participation.

15. Subgrantee shall establish and adhere to an appropriate system, consistent with federal, state and local law, for the award and monitoring of contracts which contain acceptable standards for ensuring accountability.

    The systems for soliciting and/or developing performance based contracts (20 CFR, Part 629.38(e)(2)) must include sufficient documented analysis to assure the subgrantee that costs billed as a single unit charge are reasonable.

16. Subgrantee shall ensure diligence in managing programs under this agreement including the carrying out of the appropriate monitoring activities (including audit) and in taking prompt corrective action against known violators of the Act. Specifically:

    a. Audits shall be conducted in accordance with the Standards for Audit of Governmental Organizations, Programs, Activities and Functions and with the policies and procedures established by the Governor. Audits will take place at least once every two years or as deemed necessary by the Governor. Subgrantee agrees to comply and cooperate with all audit surveys, audits and any request by the Governor to secure an audit or an audit waiver (per Section 164 of PL 97-300) on behalf of a subrecipient.

    b. The Subgrantee shall: maintain and make available to auditors (at all levels) adequate records; cooperate with all auditors; comply with all Federal regulations, local, State and Federal laws that are cited in the FESA and JTPA laws as they relate to the utilization of funds or operation of programs.

    c. Subgrantee or auditors performing audits of the subgrantee or its subrecipients shall immediately report to EDD any incidents of fraud, abuse or other criminal activity in relation to this subgrant, the Act, or regulations.

July 15, 1983

17. Personal or real property procured with JTPA funds or transferred from programs under CETA will be used for the purposes of JTPA and the subgrantee will adhere to procedures and recording requirements as may be published by the Governor in order to maintain accountability for property in SDAs.

18. The Subgrantee agrees, to the extent permitted by law, to indemnify, defend and save harmless EDD, its officers, agents and employees from any and all claims and losses accruing or resulting to any and all contractors, subcontractors, material persons, laborers and any other persons, firms or corporations furnishing or supplying work, services, materials, or supplies in connection with the performance of this subgrant, and from any and all claims and losses accruing or resulting to any person, firms or corporations which may be injured or damaged by the Subgrantee in the performance of this subgrant.

19. This subgrant contains the entire agreement of the parties and supersedes all negotiations and any other agreements between them. This subgrant is not intended to and shall not be to create the relationship of agent, servant, employee, partnership, joint venture or association between EDD and the Subgrantee.

20. Compliance

Failure on the part of the Subgrantee or a Subcontractor of the Subgrantee to comply with these provisions or with the Act or regulations may result in the issuance of a Notice of Intent to revoke approval of all or part of this subgrant as provided in JTPA, Section 164(b)(1). Consistent with State and Federal law funds may be withheld for those projects in which corrective action has not been taken until the Secretary of Labor issues a final determination on the Notice of Intent to revoke.

21. Except to the extent that State legislation permits or will permit the State to asume liability, subgrantee shall be liable for all amounts which are determined to be due by the Secretary of Labor, including but not limited to, disallowed costs, which are the result of subgrantee's or its contractor's conduct under this subgrant. Subgrantee shall be notified and shall be permitted to participate in any controversy or proceeding between subgrantor and the Department of Labor arising from this Subgrant.

B. SPECIAL PROVISIONS The following provisions apply if the Subgrantee is a nongovernmental entity (includes the Private Industry Council but does not include a consortium agency created by a Joint Powers Agreement.):

1. Prior to any disbursements of JTPA funds under this Subgrant Agreement, the Subgrantee agrees to provide to EDD an assurance that all

persons handling funds received or disbursements made hereunder are covered by fidelity bond in an amount not less than $ N/A . If the bond is cancelled or reduced, Subgrantee shall immediately so notify EDD. In that event, EDD shall make no further disbursements until it is assured adequate coverage has been obtained.

2. With respect to performance under this subgrant, and prior to final subgrant processing and approval, Subgrantee agrees to obtain and maintain in full force and effect throughout the period of this subgrant, the following minimum insurance coverages:

   a. General liability insurance with a combined limit of $500,000 or public liability coverage for $500,000 and property damage coverage for $100,000. Regardless of the type of coverage secured, a minimum aggregate of $500,000 for public liability and for property damage is required.

   b. Broad form automobile liability coverage with limits as set forth in (a) above, which applies to both owned/leased and non-owned automobiles used by the Subgrantee or its agents in performance of this subgrant, or, in the event that the Subgrantee will not utilize owned/leased automobiles but intends to require employees, trainees, or other agents to utilize their own automobiles in the performance of this subgrant, Subgrantee will secure and maintain on file from all such employees, trainees, or agents a self-certification of automobile insurance coverage.

   c. Workers' Compensation Insurance, which complies with provisions of the California Labor Code, covering all employees of the Subgrantee and participants enrolled in work experience programs. Medical and Accident Insurance will be carried for those participants not qualifying as "employed" (Section 3352. et seq. of the California Labor Code) for Workers' Compensation.

3. EDD will be named as certificate holder of policies secured in compliance with paragraphs 2. (a) and 2. (b) above and will be provided certificates of insurance or a copy of the insurance or insurance underwriter's "binder" prior to performance under the subgrant verifying compliance with subgrant insurance requirements. The coverages noted in 2. (a) and 2. (b) above must contain the following clauses:

   a. Insurance coverage will not be cancelled or changed unless 30 days prior to the effective date of cancellation or changes written notice is sent to:

      Employment Development Department
      c/o State Job Training Partnership Office
      800 Capitol Mall, MIC #69
      Sacramento, California 95814

July 15, 1983

b. State of California, its officers, employees, and servants are included as additional insureds.

c. The State of California is not responsible for direct payment of premiums or assessments on this policy.

4. Subgrantee shall comply with Executive Order No. 11246, entitled "Equal Employment Opportunity" as supplemented in Department of Labor regulations (41 CFR Part 60). Subgrantee hereby assures that it has an Affirmative Action Plan which is applicable to and covers staff and participants reimbursed through this subgrant, which declares that it does not discriminate on the basis of race, color, religion, creed, national origin, physical handicap, sex, political affiliations or beliefs and age and which specifies goals and target dates to assure the implementation of that plan. Subgrantee will file the approved documentation of the above Affirmative Action Plan with EDD (Office of Employment and Training) 10 days before the start of actual program operations.

5. Advanced funding

Before any advance is made under this Agreement, the Subgrantee shall transmit an agreement with a bank to EDD establishing a Special Bank Account. All funds under this Agreement, including advance payments, shall be made by check or wire transfer payable to the Subgrantee for deposit only in said Special Bank Account. No part of the funds in the Special Bank account shall be commingled with other funds of the Subgrantee. The funds in the Special Bank Account may be withdrawn by no less than two representatives of the Subgrantee authorized herein solely for the purpose of making payment for items of allowable costs pursuant to the terms of this Agreement or to reimburse the Subgrantee for such items of allowable cost. EDD shall have a lien upon any balance in the Special Bank Account paramount to all other liens.

a. Any two of the following persons are jointly authorized to withdraw funds from said Special Bank Account to pay costs incurred on behalf of the Subgrantee for the performance of this Agreement:

______________________________ ______________________________

______________________________ ______________________________

b. The following person(s) is (are) authorized to request funds from EDD for deposit in said Bank Account. (The requester of funds should be a different individual than the disburser of funds.)

____.

6. Before any funds are issued under this Agreement, the Subgrantee shall submit to EDD the findings of the most recent audit of its financial systems. If such audit was prior to July 1, 1981 or if no audit has been conducted, a pre-award survey of the subgrantee's accounting procedures and controls will be conducted and the results of such survey submitted to EDD.

July 15, 1983

7. Before any funds are issued under this Agreement, the Subgrantee shall stipulate how, if it becomes necessary, the Subgrantee will repay disallowed expenditures with nonfederal funds.

8 Before any funds are issued under this agreement, the Subgrantee, if it is a private nonprofit entity, will submit a copy of its status certification by the Secretary of State's Office verified by the Franchise Tax board.

9. Certification

The subgrantee certifies it is qualified and licensed to conduct business in the State of California.

July 15, 1983

STANDARD OF CONDUCT

Subgrantee hereby assures that in administering this EDD subgrant, it will comply with the standards of conduct hereinafter set out, for maintaining the integrity of the project and avoiding any conflict of interest in its administration.

General Assurance

Every reasonable course of action will be taken by the subgrantee in order to maintain the integrity of this expenditure of public funds and to avoid any favoritism, questionable or improper conduct. This subgrant will be administered in an impartial manner, free from personal, financial or political gain. The subgrantee, its executive staff and employees, in administering the subgrant, will avoid situations which give rise to a suggestion that any decision was influenced by prejudice, bias, special interest, or personal gain.

Conducting Business Involving Relatives

No relative by blood, adoption or marriage [1] of any executive or employee of the subgrantee, will receive favorable treatment for enrollment in services provided by, or employment with, the subgrantee.

Conducting Business Involving Close Personal Friends and Associates

Executives and employees of the subgrantee will be particularly aware of the varying degrees of influence that can be exerted by personal friends and associates and, in administering the subgrant, will exercise due diligence to avoid situations which may give rise to an assertion that favorable treatment is being granted to friends and associates.

When it is in the public interest for the subgrantee to conduct business with a friend or associate of an executive or employee of the subgrantee, an elected official in the area or a member of the Private Industry Council, a permanent record (see Section A, item 12(d) of the Provisions on page 4) of the transaction will be retained.

Avoidance of Conflict of Economic Interest

An executive or employee of the subgrantee, an elected official in the area or a member of the Private Industry Council, will not solicit or accept money or any other consideration from a third person, for the performance of an act reimbursed in whole or part by the subgrantee or EDD. Supplies, materials, equipment or services purchased with subgrant funds will be used solely for purposes allowed under the subgrant.

No member of the Private Industry Council shall cast a vote on the provision of services by that member (or any organization which that member represents) or vote on any matter which would provide direct financial benefit to that member or any business or organization which the members directly represents.

---

[1] For the purpose of this agreement "relative by blood or marriage" shall include: wife, husband, son, daughter, mother, father, brother, brother-in-law, sister, sister-in-law, son-in-law, daughter-in-law, mother-in-law, father-in-law, aunt, uncle, niece, nephew, stepparent, and stepchild.

COUNTY OF LOS ANGELES PROGRAM NARRATIVE

A. LOCAL CONDITIONS

1. Potentially Eligible Population

Los Angeles County plans to serve targeted welfare recipients, specifically General Relief (GR), Aid to Families With Dependent Children - Unemployed (AFDC-U), Aid to Families With Dependent Children-Family Group (AFDC-FG), youth (ages 16-21), and other JTPA eligible individuals during this nine-month interim program. The targeted welfare client population, all of whom are unemployed, will make up a large portion of the client population to be served.

This program was developed as part of an extensive effort to develop self-sufficiency among welfare recipients, reduce welfare dependency, and lower County, State, and Federal welfare costs. As the County prepares for the upcoming Family Economic Security Act (FESA), it is able to draw upon the Targeted Welfare Program to provide a comprehensive system for integrating the existing welfare system with available training and employment services.

This client population relies heavily on public transportation in terms of commuting. The Los Angeles County SDA has a highly sophisticated transit system. It is interconnected by twenty-two freeways and hundreds of surface streets and other transit routes. There are no major physical boundaries separating any areas from the rest, except for Santa Catalina and San Clemente Islands. Where appropriate, bus tickets will be provided to participants during their first week of orientation/training or until they receive their first paycheck.

Traditionally, this client group is in need of vocational/job search skills, English-as-a-Second Language (ESL), child care and adult basic education (ABE). The attached General Relief Recipient Profile provides additional information (Attachment A). Staff from the County's Department of Public Social Services (DPSS) will determine client eligibility. The Department of Community Services and contracted service providers will assess each individual's specific needs and will refer each individual to the contracting service provider which will best meet the client's training needs. This allows for an effective match of clients with available services and provides for "up front" arrangements for transportation, child care and other needed services.

A minimum of 40% of the resources will be used to train youth participants. Youth will be trained in classroom training, work experience and on-the-job training activities. Exemplary youth programs are being considered, and will be finalized during service provider selection and contract development.

2. Economy and Job Market in the Service Delivery Area

   a. Some of the major industrial segments and largest major employers in the Los Angeles County Service Delivery Area are services, government, retail trade and manufacturing. Services, government and retail trade grew in employment the most during 1982. Jobs in the services area accounted for 50% of the total of 46,500 job increases in all non-agricultural industries. The largest increase in jobs were in the health, business, and legal services. Collectively, these sectors accounted for 75% of all job growth. Employment in this industry (services) is expected to continue growing throughout 1983. Employment in health-care should expand during the first half of 1983. Business services are expected to fare well during the year including advertising, personnel agencies and protective service agencies.

Government expansion occurred primarily in state and local education sectors. A little over half of the jobs created in this industry in 1982 were in these two sectors.

Employment growth in retail trade has accounted for 12.3% of all non-agricultural job growth in the County during 1982. Eating and drinking places accounted for the greatest increases. Of the 5,700 jobs created during the year, 5,200 of them were from this sector. This industry had the smallest overall employment decline of those industries declining in 1982 (-0.3%). For every 4 jobs lost, 3 were created during last year. Assuming that the economy improves in 1983, this industry will expand, particularly during the holiday seasons.
Job gains in the wholesale trade industry will

probably occur slowly in 1983, continuing in the nondurable goods sector, and only expanding into other areas when the economy improves.

Finance, insurance and real estate, and manufacturing expanded to a small degree in 1982. Because so many jobs were lost in these industries, in comparison to gains, modest increases are expected in the finance sector during 1983. Those small increases in employment occurring in manufacturing will be in women's and misses' outerwear, communication equipment, toys, and sporting goods.

Aerospace related manufacturing, after realizing job losses over the past year, should begin to stabilize during 1983. The awarding of major military contracts to this area recently has caused several primary contractors to begin hiring workers.

Emerging industries in Los Angeles will probably be those expanding in employment at this time. They will result from breakthroughs in high technology relating to computer science, electronics, electro-optics and biological engineering. The successful growth of these industries depends upon continuing investment in existing companies located in Los Angeles County.

Those industries showing the most potential for continued growth, or diversification into the above mentioned technologies, are in business and health services, and in the manufacture of plastics materials and synthetics, structural clay products, and communication equipment. Wholesale and retail businesses will also grow as a by-product of the increasing demand for products and services offered through developments by these companies.

The strategy employed in identifying skill requirements was to equate them with occupations in demand. Using this orientation, an analysis of existing labor market resource documents has been reviewed in order to identify skill requirements. According to the Employment Data and Research Division of the State EDD, their report entitled "Projections of Employment 1980-85" was useful for estimating long term job demand. Another document published by the State EDD, entitled "Labor Supply and Demand" was useful for estimating short term job demand. Using these documents, together with the report called "California Occupational Guide", and the Bureau of Labor Statistics report "Occupational Outlook Quarterly", occupations in demand have been determined. These occupations include:

Professional & Technical Occupations

Electronic Technician
Drafter, Mechanical

Nurse, General Duty and Licensed Practical
Medical Technologist
Computer Operator
Computer Programmer
Computer Systems Analyst
Computer Systems Service Technician
Dental Assistant

Clerical Workers

Clerk Typist
Data Coder Operator
Key Punch Operator
Word Processor Operator
Clerk, General
Bookkkeeper
Bank Teller — still? as of 2/17/84?
Cashier
Stock Clerk

Craftworkers

Auto Mechanic
Auto Body Repair
Electronic Mechanic
Dental Lab Technician

Operatives

Electronic Assembler
Sewing Machine Operator, Garment
Truck Driver, Light

Sales Workers

Salesperson, General Merchandise

Services

Waiter/Waitress
Cook
Nurse Aide
Security Guards
Cleaners, Commercial & Institutional

b. Although the unemployment rate in Los Angeles County has slowly decreased in the last few months, it still remains on an equal footing with the national rate. Since 1980, there have been at least 452 plant closures in Los Angeles

County, resulting in the loss of 49,653 jobs. This represents over 35% of the plant closures and jobs lost in California during this period.

During 1982 alone, 57% of the plant closures in Los Angeles County (less the cities of Long Beach, Pasadena, Glendale, Torrance, and Los Angeles) and 90.4% of the workers dislocated occurred within the County of Los Angeles. This has had a traumatic effect on the County's labor market. During June 1983, for example, County unemployment stood at 10.2%, as compared with 10.3% for the State and [illegible] for the Nation.

In addition to numerous small plant closures, the County has experienced or will soon experience some major plant closures (General Motors, Huffy Corp., Bethlehem Steel and Aeroquip) which will affect some 7000+ employees. Employment and training programs are one means of assisting these individuals in obtaining permanent, non-subsidized employment and preventing them from becoming welfare recipients.

NOTE: Due to short time frame, the SDA statistics for Los Angeles County concerning local conditions, incorporate the Inglewood Consortium, the Cerritos Consortium and parts of the Glendale, Pasadena and Torrance consortia. When the 2 year plan is submitted in April, 1984, the Los Angeles County SDA statistics will be more precise.

B. GOALS AND OBJECTIVES

1. A Brief Statement of the SDA Performance Goals

The performance goals of the County of Los Angeles are to:

-provide employment and job training opportunities to eligible residents;

-reduce the number of persons receiving AFDC, State or local public assistance;

-reduce the number of persons unemployed;

-enable participants to acquire employable skills;

-train participants in those occupations that are responsive to current labor market and economic conditions;

-provide the necessary related support services necessary to keep a participant in the program;

-increase services to targeted groups, such as youth;

-increase involvement of the private sector through participation in the development of the County's employment and training programs;

-better coordinate and develop linkages with those agencies providing related services to ensure that programs are coordinated and non-duplicative.

-reduce education deficiencies; and

-assist participants in obtaining permanent unsubsidized employment.

Specifically, by providing appropriate employment and training services to the target client population the County will be enhancing their employability, their marketable skills, and therefore, their potential for higher wages. In addition, participants will receive employment services which include job development, job placement and job retention skills. The County will be selecting as service providers those most successful in obtaining employment for and providing employment and training services to eligible participants.

By providing training services, English-as-a-Second-Language, preemployment training and other supportive services to JTPA eligible participants, the County will be assisting these individuals in overcoming personal and environmental handicaps which inhibit their employability.

Local economic development linkages will be developed where separating any areas from the rest, except for Santa Catalina been finalized at this time.

2. Description of how SDA Plans to Achieve the Governor's Goals and Objectives

a. The County will attempt to meet those goals, as adjusted for the County's Service Delivery Area.

b. See Chart C III

c. The County will meet the Governor's primary employment and training goal to provide vocational education, job training and employment services to eligible, economically disadvantaged individuals and displaced workers, in order for them to obtain private sector employment, as follows:

Track Record

Perf K's

The County will select service providers who have demonstrated effectiveness in serving JTPA eligible clients. These service providers will be expected to enter into a fixed-rate performance contract whenever possible. Fixed-rate performance contracts require successful completion of training and placement in order for service providers to receive reimbursement for costs. The County feels that this mechanism will assure that the Governor's performance goals and objectives will be met.

In addition, service providers will be required to develop programs appropriate to the clients served and to meet the employment needs of the private sector.

3. PIC Methodology Regarding Youth Programs

The Los Angeles County Private Industry Council (PIC) was appointed on July 14, 1983 and will be developing employment competency standards for youth programs.

4. System Goals

The County has in place an automated Management Information System (MIS) which collects and organizes data in a manner that allows other departmental staff to continuously plan, operate, and evaluate programs. The overall objective of the system is to collect, organize, and print-out information to: (1) meet all mandated State reporting; (2) provide program evaluation and control data; and (3) to provide management with key information for planning and decision making.

MIS also conducts a bi-monthly analysis of various reports, such as, participant listings, terminations, and participant characteristics to ensure validation. Subcontractors are provided with reports to certify that the information is correct.

The County is in the process of also automating its fiscal system and planning process. This process would provide automated information which would enable the County to prepare reports, modifications and applications with the most current information available in a shorter time span.

C. SERVICES TO BE PROVIDED

1. Method by which Training will be Delivered

The following is a brief description of each activity and service provided by Los Angeles County under Title II-A of JTPA. The expected outcomes for these activities is placement in unsubsidized employment.

Relevant to all activities, participants will be trained from the following principal occupational areas:

Painter Trainees
Typist/Clerk
Bookkeeper

Billing Clerk
Photoengraver
Plate Printer
Auto Mech./Appren.
Adult Basic Education
Maintenance
Food Service Worker
Horticulture
Factory/Assembly
Insurance Clerk
Medical Records Clerk

Machinist
Skip Tracer
Credit Consultant
State Investigator

Industrial Accident
  Investigator/Ins. Co.
Credit Verifier
Attorney Services
Bank Mgmt. Trainee
Medical Assistant
Transcription Specialist
Insurance Specialist
Teacher's Aide

Drill Press Operator
Punch Press Operator
Upholstery/Furniture

Warehouseperson
Shipping/Receiving Clerk
Bank Teller
EKG Technician
Nurses Aides
Dental Assistant
Medical Receptionist
Keypunch Repair
Heavy Truckdriver
Optometric Assistant
Credit Collector

Motorcycle Repair
Medical Secretary
Medical Office Manager
Apprentice Carpenter
Data Entry Clerk

Welders
Refrigeration Mechanic
Alarm Installers
Secretary
Child Care Teaching Assts.
Statistical Typist
Airline/Travel Trainee
Accountant
Auto Body Trainees

Training activities will be comprised of adult and youth programs. Approximately 60% of the JTPA allocation will fund adult programs and the remaining 40% (minimum) will fund youth programs. There are no legal requirements for particular types of youth or adult activities other than the mandate to utilize at least 40% of the resources for youth programs (under the age of 22).

Adult Programs (22 years of age or older):

Classroom Training

Los Angeles County's program includes training conducted in an institutional setting for vocational education which is designed to provide individuals with the technical skills and information required to perform a specific job or group of jobs. This activity may also include training aimed at enhancing the employability of individuals by upgrading basic skills through provision of courses in, for example, remedial education (Adult Basic Education - ABE) or English-as-a Second Language, with subsequent or concurrent enrollment in a vocational education course of instruction. Also combined activities such as Classroom Training/Work Experience will be utilized where appropriate for the individual client. The estimated duration of service will range from two to six months.

Stipends will be paid those individuals who are eligible to receive them in accordance with Department of Labor regulations. Determination of stipends and their payment shall be the responsibility of the County.

Pre-employment/OJT

This program activity provides occupational training, conducted in a work environment, which enables an individual to learn a skill and to qualify for the occupation through demonstration and practice.

The planned activities will relate to the needs of the client population. The training is so designed that it should enable individuals to acquire adequate skill levels to obtain immediate employment and enhance their ability to retain such employment. On-the-Job-Training may be conducted with either private or public employers. In each case the training must be conducted on a "hire first, train later" basis. The contractor can reimburse the employer, for extraordinary training costs for training on the job, up to a level not to exceed 50% of participant wages. The contractor must provide for training commensurate with the skill levels identified in the job description and training outline for a period of time no less than 8 weeks. Skill level type occupations with a training duration of 6-9 months will be encouraged. In all cases, the Dictionary of Occupational Titles (D.O.T) shall be used to determine the specific lengths of training for each occupation in which On-the-Job-Training work slots are developed. A combined feature to On-the-Job Training this year is preemployment training. A portion of the targeted service population will consist of welfare recipients, whose work histories do not suggest stable, successful employment. Retention of these individuals in training with employers is very low. Pre-employment training, which consists of development of good work attitudes and habits, grooming, resume writing, mock job interviews, meeting child care needs and transportation difficulties, will enhance the the participants' ability to secure and remain on the job with an employer. In situations where applicable, the employer will be involved in this effort.

Classroom Training/Work Experience

The primary emphasis in this combined training activity is work experience. Traditionally, it is designed to enhance the potential of adults in obtaining a planned occupational goal. The estimated duration of service will range from two to six months. Work experience includes the following:

- short-term employment for participants who have no occupational goals and for whom no training or job opportunity is immediately available.

- short-term employment for participants who have no definite occupational goals or training and for whom a job opportunity is being developed.

The following are contractor responsibilities:

Work Schedule -

- provide for participants to work a maximum of 8 hours per day according to schedule of work site.

- provide for educational or supplemental activity for the participant.
- ensure that wages shall be commensurate to the type of work performed, provided that this wage is not less than the prevailing minimum wage.

Worksites

It is the responsibility of the contractor to develop and provide worksites in public or private non-profit agencies in order to train and prepare participants for permanent job placement, return to school, or other positive terminations. In selecting worksites the contractor shall:

- provide orientation to all supervisors of work experience participants concerning the objectives of this activity and the procedures to be followed.
- develop worksites in non-profit agencies other than County facilities unless an agreement with the County facility has been approved by the County. The subcontractors must obtain approval from the County for each worksite agreement prior to the placement of any participant at the site.

The combined classroom training activity with work experience for this new JTPA year is designed to enhance the receptiveness of the JTPA participants before they are situated into a traditional work environment.

This will consist of pre-employment training as discussed, in combination with the OJT activity and/or English-as-a-Second Language or Adult Basic Education instructions as most of this population will require remedial instruction. A similar pilot program conducted by the County in 1982-83 confirmed the need for this classroom training activity.

For the Adult program, the average cost per participant will be a low of $630 to a high of $770. Overall, 3[illegible].59% of the total adult enrolees will be placed in unsubsidized employment.

Low

Youth Programs (ages 16-21)

In the Youth Program, the average cost per participant will be a low of $3,454 to a high of $[illegible],626.

Classroom Training (ages 18-21)

The description for this activity is the same as the narrative for the adult program. However, out-of-school youths in the age range of 18-21 are emphasized.

On-the-Job Training (ages 18-21)

The description for this activity is the same as the narrative for the adult program. However, out of school youths in the age range of 18-21 are emphasized. Funding in this activity is not substantial so as to not create competition for available slots with the adult OJT program.

Entry Employment Experience *

This activity is aimed at youth, ages 16-18. These experiences may be up to 20 hours weekly during the school year or full time during the summer and holidays, for a total of not to exceed 500 hours for any individual. Such experiences will be appropriately supervised, including the maintenance of standards of attendance and worksite performance. Entry employment experiences may be one of the following types:

* Emphasis will be on funding youth programs, ages 19-21; however, a very small number of youth programs, such as this, aimed at in-school youth, ages 16-21, may also be considered.

(1) Try Out Employment In The Private Sector. *

This is a training activity aimed at youth (ages 16-21) and provides entry employment experiences. Such experiences will be appropriately supervised, including the maintenance of standards of attendance and worksite performance. Worksite may be private for profit, public and private non-profit when private for profit worksites are not available. The length of any assignment to a try-out employment position shall not exceed 250 hours. These positions shall be ones for which participants would not usually be hired (because of lack of experience or other barriers to employment), and vacancies in positions may not be refilled if the previous participant completed the try-out employment but was not hired by the employer.

(2) Full-time employment opportunities in public and private non-profit agencies during the summer and on a part-time basis in combination with education and training activities. Activities will involve community improvement services.

(3) Cooperative education programs with the private sector.

School to Work Transition *

These are training activities geared towards youth ages 16-18 who are dropouts or high school seniors who plan to enter the full-time labor market upon graduation. Transition services include such things as: occupational information, short duration job search assistance, job clubs, placement and job development, and follow-up.

(a) For this nine-month interim program, the County has decided to use existing contractors, letters of intent, past peformance, and concept papers to select service providers. Targeted Requests for Proposals will be solicited during the program period, if necessary, as funds become available.

As part of the selection process, a County CETA bulletin was sent to all fiscal year 1983 CETA contractors which provided them with information relative to the implementation of JTPA and described the service

---

* Emphasis will be on funding youth progtams, ages 18-21; however, a very small number of youth programs, such as this, aimed at in-school youth, ages 16-21 may also be considered.

provider selection process that would be used during 1983/84, the first year under JTPA. Federal regulations implementing JTPA were also attached for their review.

Contractors were advised to examine closely the implications of the JTPA regulations on the operation of their employment and training programs. They were requested to indicate to the County whether they would be interested in continuing as a service provider for FY 1984. Those contractors, who wished to participate in the first year of JTPA as an employment and training subcontractor, were asked to indicate their interest in a letter of intent.

The bulletin detailed how performance would be determined:

> "It should be noted that specific program requirements for contractors in the County's 1983-84 JTPA programs are now being developed. Once these have been finalized, agencies interested in contracting with the County for 1983-84 will be required to demonstrate their willingness and ability to meet those requirements before a contract is recommended.
>
> In the absence of a proposal, particular stress will be placed upon evaluations of agency performance during the contract year 1981/82 and the first two (2) quarters of your 82/83 contract. Performance indicators to be used by the Department in evaluating these programs are described below:

Performance Indicators

1. Placement Rate:

   Total Placements
   Total Terminations

2. Postive Terminations Rate:

   Total Placements and total other positive
   Total Terminations

3. Agency cost per placement:

   Total Admin., Training, an Service Expenditures
   Total Placements

4. Agency cost per positive termination:

   Total Admin., Training, and Service Expenditures
   Total placements and total other positive terminations

5. Post Training Wages

6. Job Retention Rate

7. Administrative Capability

8. Planned vs actual, especially with regard to significant segments served and service to participants.

Minimum levels of performance adopted by the Private Industry Council (PIC) will be adhered to.. These are as follows:

Classroom Training:	55% Placement Rate 85% Completion Rate
On-the-Job Training:	65% Placement Rate 85% Completion Rate
Work Experience/: Out-of-School	50% Placement Rate 85% Completion Rate

NOTE: Placements made more than 30 days after termination will not be counted as a placement for evaluation purposes.

Deviations of no more than 10-15% are allowed for agencies serving special target groups (at least 50%), such as offenders, handicapped and youth. The AFDC-U/GR referrals will be evaluated separately. While no agency will be penalized for serving large numbers of AFDC-U GR referrals, success with this group will be viewed very favorably, especially since the Job Training Partnership Act of 1982, which goes into effect in 1983, focuses heavily on welfare recipients.

Assessments will be made separately for each program activity (classroom training, on-the-job training, and work experience) and the results ranked within each category. An agency's ranking will indicate its effectiveness as compared to othe agencies providing the same activity.

Contracts for 1982-83 were developed in accordance with what agencies indicated were their minimum needs to operate an effective program. Agency administrators and their Board of Directors should be aware that those costs may or may not prove to be competitive with other agencies providing similar training. Agencies are, therefore, alerted to the fact that mere adherence to contract goals will not in itself guarantee refunding or a high ranking in performance assessments.

The County is presently looking at performance contracts to see if they require a different performance evaluation process. If a separate evaluation process for performance contracts is developed, appropriate service providers will be notified.

Informaton used to develop the evaluations will be provided to service providers for review before evalutions are completed. It is the responsibility of each service provider to make certain that any inaccuracies are resolved with our Management Information System (MIS) unit within the allotted time provided.

This evaluation tool will be applied to the quarter ended March 31, 1983. Please make certain that MIS has all appropriate information for the quarter as soon as possible."

This statistical information was compiled for all contractors and submitted to the Private Industry Council (PIC) for their approval. The PIC reviewed each FY 1983 CETA contractor's statistics individually and made their recommendations to the Board of Supervisors. Recommendations were based on factors which included statistical data, a contractor's ability to function under JTPA regulations, geographic locations, activities conducted and training occupations offered.

(b) See chart C-II

(c) See chart C-II

2. Exemplary Youth Programs

The county of Los Angeles is currently in the process of selecting service providers. Where appropriate, these agencies may administer one or more of the exemplary youth programs described in Section 205 of the Act; however, specific information, such as, program description, outcomes and performance measures, will be provided at a later date. (See prior description of youth programs)

a. See chart C-II
b. "
c. "
d. "

3. Client Services

Client services to be provided include, but are not limited to: outreach, counseling, job search assistance, needs-based payments, supportive services, placement services, job development, and follow-up. Duration of service will vary by participant depending on need and type of service.

(a) Those client services necessary to keep a participant in training and/or those services necessary to help a participant complete the transition into unsubsidized employment will be given first priority and will be based on individual need.

(b) In the past the following entities have provided services for the county's employment and training programs. It is planned that these same entities will be utilized for the JTPA program.

The County maximizes services to job training clients through coordination and linkages with a variety of agencies, programs and organizations. Linkages include, but are not limited to:

AGENCY	SERVICES PROVIDED
Local School Districts	Arrange for academic credit to be awarded to participants
California State Department	provide joint funding with the County to innovative vocational education programs

Private Sector Business	provide On-the-Job Training Provide Vocational Exploration Provide job commitments in customized training programs Private Industry Council (PIC) participation
Department of Rehabilitation	Referral services of clients to the County's employment and training programs Supportive services to handicapped participants locally proposed for representation of the new County PIC Technical assistance to County and subcontract agencies on services available to handicapped participants Documentation of participant's handicapped status
State Economic and Business Development Department	Identification of expanding and new businesses Identification of economic development areas
State Division of Apprenticeship Standards	Representation on PIC Review of proposed vocational training programs for conformity with established State standards
Department of Public Social Services	Referral of welfare clients for placement in training programs Representation on PIC
Community Based Organizations	Provide a network of various referral and supportive services.

The County will be negotiating a Non-Financial Agreement with EDD to coordinate activities and services to be provided by EDD to the County and to County training participants. Activites and services planned will include:

- Applicant Screening
- Employment Counseling
- Vocational Testing
- Recruitment Services
- Vocational Training Referral
- Job Search Workshop
- Use of listing programs, which gives employers and Federal contracts an opportunity to identify and hire veterans
- EDD referral of participants for Job Service Assistance Programs
- Labor Market Information
- Job Corps Participant Referrals
- Participation in public information efforts

(c) Whenever possible, supportive services will be provided by service providers at no JTPA cost (adult programs). Service Providers will be expected to fulfill service needs of the individual client through other non JTPA resources, such as, matching funds or funds from other sources.

4. Employer related services will be provided by the County's JTPA contractors who have demonstrated the capability of providing employment and training services in accordance with the JTPA regulations. These contractors will be operating, whenever possible, on fixed-rate performance contracts which require successful placements of participants (positive termination for in-school youth) into unsubsidized employment in order for that portion of the contract to be reimbursed. The County feels that such types of contracts help achieve the program goal of obtaining employment and positive terminations for participants.

Major emphasis will be placed on obtaining employment through job openings. Employment generating activities will be used to solicit private industry interest in JTPA training programs for participants planning to complete training and who would be seeking unsubsidized placements or customized training opportunities.

D. CLIENTS TO BE SERVED

1. and 2.

Although the County plans to target a large portion of the adult program to welfare recipients, non-welfare JTPA-eligible participants will be included in other segments of the program.

During the nine-month initial implementation period of the adult JTPA program an effort will be made to move employable General Relief (GR)/Aid to Families with Dependent Children Unemployed (AFDC-U) recipients into work/training activities. The County Department of Public Social Services (DPSS) has identified a potential caseload of 10,532 GR-Employable in its service area (See Attachment A).

Based upon the results of the County of Los Angeles' pilot program of GR placement into the CETA program, the County estimates a minimum of 4,700 continuous jobs slots will be provided for this activity during the nine-month period.

3. and 4.

The County will provide employment and training opportunities to school dropouts and other substantial segments at equitable levels. Service providers will be encouraged to provide equitable levels of services to all segments represented in this targeted client population.

5. Determination will be made at a later date.

E. COORDINATION

Because of the limited time available to develop this interim nine-month plan and because the County's PIC has not yet been available to give direction in the area of coordination, the County can only describe what it will do in the area of coordination.

Coordination with the following will be accomplished during the nine-month interim program:

- Other agencies within the SDA providing job training, vocational and remedial education, and client advocacy;
- State and local secondary and post-secondary educational agencies;
- Local EDD (cooperation agreement);
- Other SDA's in labor market area;
- JTPA Titles III and IV service providers;
- Governor's Coordination and Special Services Plan.

Coordination with County welfare systems has already begun. The County's Department of Public Social Services (DPSS) and Department of Community Services have developed a referral system to respond to welfare recipient (GR and AFDC-U) employment and training needs. It is estimated that this program will process as many as 10,532 welfare recipients off of the County's welfare rolls.

Outreach and Recruitment

A large portion of program participants will be recruited from the County DPSS GR-Employable caseload and referrals from agencies which deal with youth, including the school districts and County Probation Department.

Other agencies, such as, the State Employment Development Department, County Senior Citizens Affairs Department, County Department of Military and Veterans Affairs and the State Rehabilitation Department will be used to facilitate recruitment efforts as in prior years.

To the maximum extent feasible, participants will be recruited based on the percentage breakdown of each target group within the targeted eligible population as required in Sec. 203 of JTPA.

See Exhibit D for estimated participant program plan.

F. DOCUMENTATION

During this nine-month program period, the Department of Community Services will operate an innovative employment and training program structured to convert employable welfare (Aid to Families with Dependent Children-Unemployed, and General Relief) recipients from a welfare activity to a work/training opportunity.

This project will provide activities which will enable the welfare recipients in the County of Los Angeles to be removed from the welfare rolls and receive job training that will prepare them for unsubsidized employment. The project will assist in controlling the cost of the spiraling General Relief cost that is anticipated for this fiscal year.

The County has ventured into this project to serve approximately 10,000 welfare recipients, including a substantial number of refugees whose Federal reimbursement has expired. In conjunction with the Department of Public Social Services, the project will operate as follows:

- All persons applying for GR benefits will be interviewed to determine the eligibility;

- Upon determining eligibility, an assessment will be made relative to applicant being employable;

- Employability determination will be made on clients presently receiving welfare;

- Eligible, employable persons will be removed from welfare rolls and placed in one of the following activities:
  Job search for immediate job placement through the Department of Community Services Job Development Section; placement in job training programs to enhance skills and prepare clients for unsubsidized employment; or placed in an Income Generating Project.

1. Costs and Payments
   a. Not at this time
   b. Adult welfare participants will receive stipends no less than what they would receive under a welfare grant. Formula would be based on welfase eligibility criteria adopted by Los Angeles County Department of Public Social Services.

2. Services to Clients

   a. Approximately 39% of the participants served by the County may reside outside the County's SDA area. As part of the County's targeted welfare recipient program for adults, the County intends to serve all General Relief employable clients being served now and during this interim period by the County's Department of Public Social Services. These General Relief employable recipients reside throughout the County including areas outside of the County's SDA.

      As an SDA, the County is responsible for welfare programs throughout the County in terms of providing coordination of services to welfare clients.

      The County feels that service to this client population will provide much-needed services to a segment usually not served by employment and training programs. At the same time, the County will reduce welfare dependency and will maximize access for this population segment to employment and training opportunities.

      Presently the County is negotiating with other SDA's regarding the service to General Relief employable recipients that reside in their SDA areas. To date these SDAs appear receptive to the County's adult targeted welfare recipient program.

   b. Determination will be made at a later date.

3. Selection of Service Providers

   a. Due to time constraints, the County is still in the process of selecting service providers to operate the JTPA program. Service providers selected will have been contractors under the CETA program.

   b. No new service providers will be contracted with during this nine month interim program, unless it is in response to a targeted RFP that the County's current contractors cannot provide services for.

4. Title III Program

   a. The County is receiving approximately $1 million in JTPA Title III funds to administor County-wide Dislocated Worker Programs 8/1/83 through 6/30/84.

   b. Yes, the County plans to apply for Title III funds and administer these programs.

[illegible]

JOB TRAINING PARTNERSHIP ACT (1)
PLANNING INFORMATION FOR APPLICANT SERVICE DELIVERY AREAS
JULY 18,1983 REVISION A PRELIMINARY

E: LOS ANGELES COUNTY (LESS:GLENDALE, LONG BEACH, LOS ANGELES, PASADENA AND TORRANCE)

POPULATION CHARACTERISTICS (2)

	TOTAL	WHITE	BLACK	INDIAN	ASIAN	OTHER	**	HISPANIC
NS IN POVERTY:	334,871	184,115	52,713	3,514	13,495	81,034	**	175,767
NT OF TOTAL POVERTY:	100.00	54.98	15.74	1.05	4.03	24.20	**	52.49

	TOTAL	ADULTS (22 +)	YOUTH (16-22)	**	SCHOOL DROPOUTS	AFDC REGISTRANTS
ECONOMICALLY DISADVANTAGED	558,321	282,338	71,686	**	117,392	57,910
PERCENT OF DISADVANTAGED	100.00	50.57	12.84	**		

MICALLY DISADVANTAGED YOUTH AS %
CONOMICALLY DISADVANTAGED ADULT: 25.39

ADJUSTED PERCENT OF FUNDS TO
ECONOMICALLY DISADVANTAGED YOUTH: 44.29

AVERAGE WEEKLY
WAGE FOR AREA: $314

FAMILY STATUS

SINGLE MOTHER W/ CHILD .... (YOUNGEST CHILD UNDER 6 YEARS OLD)	18,433
SINGLE MOTHER W/ CHILD .... (YOUNGEST CHILD OVER 6 YEARS OLD)	12,679

OTHER BARRIERS

LIMITED ENGLISH LANGUAGE PROFICIENCY	196,296
HANDICAPPED	139,879
OFFENDERS	28,588
VETERANS	307,408

EMPLOYMENT STATUS

EMPLOYED	1,187,075
UNEMPLOYED	121,400
NOT IN LABOR FORCE	706,608
UNEMPLOYMENT RATE	9.28
UI RECIPIENTS	199,785
-- SHORT TERM .... (1-14 OF PREVIOUS 26 WEEKS)	129,895
-- LONG TERM .... (15 OR MORE OF PREVIOUS 26 WEEKS)	69,890
-- EXHAUSTS	51,200
PUBLIC ASSISTANCE RECIPIENTS	68,976

RCE: EMPLOYMENT DEVELOPMENT DEPARTMENT, EMPLOYMENT DATA AND RESEARCH DIVISON, LABOR MARKET INFORMATION SECTION

(1): FOR ADDITIONAL INFORMATION CONCERNING DEFINITIONS AND DATA REFERENCE PERIODS, CONTACT LOCAL LABOR MARKET ANALYSTS, EMPLOYMENT DEVELOPMENT DEPARTMENT, EMPLOYMENT DATA AND RESEARCH DIVISION, AREA LABOR MARKET INFORMATION GROUPS.

[illegible]

ATTACHMENT A

APPROVED GR-EMPLOYABLE CASELOAD
May 1983

DPSS DISTRICT	GR-E CASES
Compton	857
Long Beach Spec. Aids	602
Glendale	37
Lancaster	167
Pasadena	275
West Valley	95
Civic Center	2,207
Metro East	737
Metro Spec. Aids	1,031
Florence	672
South Central	801
Southwest Spec. Aids	867
Cudahy	239
Lincoln Heights	106
Pomona	282
San Gabriel Valley	146
Echo Park	765
Rancho Park	646
Total	10,532

Research & Statistical Services Section
July 11, 1983

ATTACHMENT A

CHARACTERISTICS OF EMPLOYABLE GENERAL RELIEF RECIPIENTS

Gender: Male 72% Female 28%

Average Age: 37.1 years

Ethnicity:

White	Hispanic	Black	Asian	Other
21%	21%	49%	8%	1%

Primary Language:

English	88%
Spanish	9%
Other	3%
Total	100%

Average Time On Aid: 5.6 months

Education:

Average years of schooling	11.1 years	
High School graduate:	Yes 59%	No 41%
Prior vocational training:	Yes 23%	No 77%

Means of Transportation:

Public	92%
Private	8%

Former Occupation:

Unskilled labor	39%
Clerical	17%
Assembly	8%
Skilled labor	7%
Trades	5%
Other	12%
Never employed	12%
Total	100%

Chart CII

JTPA TRAINING SERVICES PLAN
(SUGGESTED)

gram egories	2 Total Dollars Targeted	3 Planned Number of Participants	4 Planned Length of Training	5 Planned Cost Per Participant	6 Expected Outc and Comments
ssroom ining medial/Basic)					
ssroom ining upational)	$4,054,009	5,800	20 weeks	$699*	
-Job ining	978,553	1,400	20 Weeks	699*	
r Employer ed Trn'g. (JTPA 4 §§6,7,12,24,28					
Experience	1,957,108	2,800	20 Weeks	699*	
lary Youth rams	5,491,883	1,760	20 Weeks	3,120	
vices to ticipants					
rvices to loyers					
r Activities					
al	$12,481,553	11,760	20 Weeks	$1,061	

*These costs only include the JTPA allocation. Additional resources from County General Funds will be used to augment remaining participant costs needed to complete the planned length of training.

PERFORMANCE OBJECTIVES
Title IIA

Delivery Area COUNTY OF LOS ANGELES
October 1, 1983 to June 30, 1984

Adult Objectives	National Standards	To Be Completed by SDA Pursuant to DOL Standards and Guidelines Variance Factor	SDA Planned Objectives
tered Employment Rate—ber of adults who enter loyment as a percentage of number of adults who minate.	50.4% (proposed)	121 -18.00	38.59% 38.3%
st per entered Employment—al expenditures for adults vided by the number of ults who enter employment.	$7,172.22 (proposed)	1,532.39	$ 7,998.75
erage Wage at Placement—rage wage for all adults who ter employment at the time of mination.	$4.39 per hour (proposed)	.14	4.53
lfare Entered Employment ate—Number of adult welfare cipients who enter employ-nt at termination as a rcentage of the number of ult welfare recipients who rminate.	Determined by SDA (See Guidelines)	N/A	22.4%
Youth Objectives ntered Employment Rate—umber of youth who enter mployment at termination as a percentage of the number of youth who terminate.	28.7% (proposed)	5.6	34.02%
Positive Termination Rate—Number of youth having a positive termination (entered employment plus employability enhancement terminations) as a percentage of the total number of youth who terminate.	76.7% (proposed)	-9.73	66.85%
Cost Per Positive Termination—Total expenditures for youth divided by the number of youth having a positive termination.	$4,351.50 (proposed)	857.39	$ 4,599.38

July 15, 1983

Service Delivery Area ____________

Registration No. ____________

Modification No. ____________

Funding Title ____________

Participant Program Plan

	Planned Enrollments		Planned Terminations				Total		
			Adult		Youth			Adult	Youth
	Number	% of Total	Number	% of Total	Number	% of Total	Number	% of Total	% of Total
I. Client Characteristics									
A. Total Participants	11760	100%	9000	100%	1594	100%	10594	85	15
B. Male	8027	68	6480	72	744	47	7224	90	10
C. Female	3733	32	2520	28	840	53	3360	75	25
D. 14-15 Year Olds	-0-	-0-			-0-	-0-	-0-		-0-
E. 16-19 Year Olds	1179	10			1061	67	1061		100
F. 20-21	581	5			523	33	523		100
G. 22-44	8225	69.90	7403	82			7403	100	
H. 45-54	570	4.85	513	6			513	100	
I. 55 and Over	1205	10.25	1025	12			1025	100	
J. White (Non-Hispanic)	1652	14	[illegible]	12	[illegible]	23	[illegible]	75	[illegible]
K. Black (Non-Hispanic)	3004	25	2585	29	119	8	2704	96	[illegible]
L. Asian/Pacific Islander	870	7	720	8	63	4	783	92	8
M. American Indian/Alaskan Native	118	1	90	1	16	1	106	85	15
N. Hispanic	6115	52	[illegible]	52	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
II. Service Parity									
A. School Dropouts	2576	22	1890	21	428	27	2318	82	18
B. AFDC Registrants	1176	10	284	3	774	49	1058	27	73

NOTE: The "other" racial/ethnicity group in the planning information provided by EDD represents individuals who declined to state race/ethnicity during the 1980 census. For planning purposes they are to be distributed among the four racial/ethnic groups in proportion to each group's incidence in the local population.

	Planned Enrollments		Planned Terminations				Total		
			Adult		Youth			Adult	Youth
III. Other Substantial Segments	Number	% of Total	Number	% of Total	Number	% of Total	Number	% of Total	% of Total
A. Handicapped	823	7	630	7	111	7	741	85	15
B. Unemployment Insurance Claimant	387	3	-0-	-0-	348	22	348	-0-	100
C. Veterans	2018	17	1800	20	16	1	1816	99	1
D.									
E.									
F.									
G.									
H.									
I.									
J.									
K.									
L.									
IV. Termination Data			☒	☒	☒	☒	☒	☒	☒
A. Entered Unsubsidized Employment			2880	32	540	34	3420	84	16
B. Youth Employability Enhancement Term			☒	☒	523	33	523	☒	100
C. Other Terminations			6120	68	521	33	6641	92	8
D. Average Weeks of Training			20	☒	20	☒	20	☒	☒
E. Average Wage at Placement			452	☒	NA	☒	4.52	☒	☒

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name COUNTY OF ANGELES		B. SDA Number	
Performance Period	D. TYPE OF Standard ☐ Plan ☐ Recalculated	DATE Calculated	E. PERFORMANCE MEASURE A. Average Wage at Placement (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NAT. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female	28.0	51.7	-23.7	-.002	.0474
2. % 45-54 years old	4.85	4.5	.35	.001	.0004
3. % 55 years old & over	10.25	2.2	8.05	-.015	-.1208
4. % Black	26	29.9	3.09	-.003	.0117
5. % Hispanic	52	9.4	42.06	.000	.0117
6. % Other minority	9.0	4.9	4.1	.007	.0287
7. % Dropout	21.0	30.2	-9.2	-.007	.0644
8. % Handicapped	7.0	10.1	-3.1	.003	-.0093
9. % UI claimant	0.0	7.0	-7.0	.007	-.0490
10. % Welfare recipient	90.0	30.7	59.3	.001	.0593
11. Average wage for area (000)	16.3	15.3	1.0	.109	.1090
				TOTAL	.1418

L. National Departure Point (National Average Performance Level)	$4.39	M.	
N. Model-Adjusted Performance Standard	4.53		
O. Tolerance Limits	(+) $ (-) $		
Governor's Adjustment Factor	$ [illegible]		

[illegible]

JTPA Performance Standards Worksheet

Performance Period PY ______	Type of Standard [ ] Plan [ ] Recalculated	DATE Calculated ______

Service Delivery Area's Name: COUNTY OF LOS ANGELES

SDA

PERFORMANCE MEASURE: A Cost per Entered Employment (Adult)

LOCAL FACTORS	SDA Factor Values	NATL. AVG. FACTOR VALUES	DIFFERENCE	WEIGHTS	EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	28.0	51.7	- 23.7	22.04	- 522.
2. % 45-54 years old	4.05	4.5	.35	96.66	33.
3. % 55 years old & over	10.25	2.2	8.05	-78.39	-631.
4. % Black	26	29.5	3.04	4.19	- 16.
5. % Hispanic	52	9.4	42.06	-2.21	-94.
6. % Other minority	9.0	4.9	4.1	-20.12	- 82.
7. % Dropout	21.0	30.2	- 9.2	17.73	- 163.
8. % Handicapped	7.0	10.1	- 3.1	9.00	- 27.
9. % UI claimant	0.0	7.0	- 7.0	-.66	4.
10. % Welfare recipient	90.0	30.7	59.3	49.43	2,931.
11. Average wage for area (000)	16.3	15.3	1.0	366.99	366.
12. Unemployment rate	9.3	9.0	0.3	323.27	96.
13. Average weeks participated	20.0	29.5	- 9.5	112.60	- 1,069.
				TOTAL	826.5

National Departure Point (National Average Performance Level)	$7,172.22		
Model-Adjusted Performance Standard	7,998.75		
Parameters Limits	(+) 20 (-) 25		
Governor's Adjustment Factor	% pts./% ( )		

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name COUNTY OF LOS ANGELES	B. SDA Number
C. Performance Period PY ______	D. Type of Standard ☐ Plan ☐ Recalculated
E. Performance Measure A. Entered Employment Rate (Adult)	

F. Local Factors	G. SDA Factor Values	H. Natl. Avg. Factor Values	I. Difference (G minus H)	J. Weights	K. Effect of Local Factors on Performance Expectations
1. % Female	28.0 ✓	51.7	-23.7	.03	- .71
2. % 45-54 years old	4.85 6.9	4.3	1.9 .55	-.56	-.672 -.146
3. % 55 years old & over	10.25 12.0	2.2	9.8 .05	.21	2.07 1.69
4. % Black	26 29.11	29.9	-4.0 .09	-.07	+.083 +.273
5. % Hispanic	52 ✓	9.4	42 2.06	.08	3.408
6. % Other minority ✓	9.0	4.9	4.1	.18	.74
7. % Dropout	21.0 ✓	30.7	-9.2	-.08	.74
8. % Handicapped	7.0 ✓	10.1	-3.1	-.20	.62 ✓
9. % UI claimant	0.0 ✓	7.0	-7.0	.26	- 1.82 ✓
10. % Welfare recipient	90.0	30.7	59.3	-.26	- 15.42 ✓
11. Average wage for area (000)	16.3 ✓	15.3	1.0	-.60	- .60 ✓
12. Unemployment rate	9.3 ✓	9.0	0.3	-1.53	- .46 ✓
					+ 7.661
					= 19.762
				TOTAL →	- 12.101 -11.815

L. National Departure Point (National Average Performance Level)	58.44		
M. Model-Adjusted Performance Standard	38.595 390		
N. Parameters Limits	(+) 13 (-) 17		
Governor's Adjustment Factor			

JTPA Performance Standards Worksheet

Service Delivery Area's Name: COUNTY OF LOS ANGELES

Performance Period Y	Type of Standard Plan Recalculated	DATE Calculated	Performance Measure A Cost per Positive Termination (Youth)

Local Factors	SDA Factor Values	Natl. Avg. Factor Values	Difference	Weights	Effect of Local Factor on Performance Expectations
1. % Female	52.7	47.2	5.5	-12.13	- 66.72
2. % 14-15 years old	0	6.9	- 6.9	-57.02	93.44
3. % 16-19 years old	67.0	81.0	-14.0	-42.05	529.90
4. % Black	8	33.7	-25.7	-9.55	245.44
5. % Hispanic	52	10.9	41.10	-1.73	- 71.10
6. % Other minority	5.0	3.9	1.1	-40.97	- 45.07
7. % Dropout	26.5	23.7	2.8	42.12	[illegible]
8. % UI claimant	1.0*	1.0	-0-	-44.43	-0-
9. % Welfare recipient	31.1	32.1	-1.0	5.00	- 5.0
10. Average wage for area (000)	16.3	15.3	1.0	208.04	208.04
11. Unemployment rate	17.7	9.0	8.7	87.04	757.21
12. Average weeks participated	20	39.2	-19.2	83.75	-12.08
				TOTAL ➤	246.[illegible]

National Departure Point (National Average Performance/Level)	$4,351.50	
Model-Adjusted Performance Std.	$4,598.38	
Parameters Limits	(+) 30 (-) 31	
Governor's Adjustment Factor	( ) % pts./$	
Performance Standard		

*Local SDA data base was not accurate

US DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name: COUNTY OF LOS ANGELES

B. SDA NUMBER

Performance Period

D. TYPE OF Standard ☐ Plan ☐ Recalculated

DATE Calculated

C. PERFORMANCE MEASURE: A. Positive Termination Rate (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I x J)
1. % Female	52.7	47.2	5.5	.18	.99
2. % 14-15 years old	0	6.9	- 6.9	.25	- 1.73
3. % 16-19 years old	67.0	81.0	-14.0	.21	- 2.94
4. % Black	8	33.7	-25.7	.03	- .771
5. % Hispanic	52	10.9	41.10	.00	0
6. % Other minority	5.0	3.9	1.1	.32	0.35
7. % Dropout	26.5	23.7	2.8	-.27	- 0.76
8. % UI claimant	1.0*	1.0	0	.77	0
9. % Welfare recipient	31.1	32.1	- 1.0	-.13	0.13
10. Average wage for area (000)	16.3	15.3	1.0	-.68	- 0.68
11. Unemployment rate	17.7	9.0	8.7	-.51	- 4.44
				TOTAL	-9.85

L. National Departure Point (National Average Performance Level): 76.71

M. Model-Adjusted Performance Standard: 66.853

N. Parameters Limits: (+) 11 (-) 10

Governor's Adjustment Factor: X plus .75 [illegible] 82-12-01

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

COUNTY OF LOS ANGELES

C. Performance Period PY ______	D. Type of Standard [ ] Plan [ ] Recalculated	Date Calculated ______	E. PERFORMANCE MEASURE A. Entered Employment Rate (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL AVG FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTORS ON PERFORMANCE EXPECTATIONS (I × J)
1. % Female	52.7	47.2	5.5	.07	.39
2. % 14-15 years old	0.0	6.9	- 6.9	-.66	4.55
3. % 16-19 years old	57.0	81.0	-14.0	-.43	6.02
4. % Black	8	33.7	-25.7	-.0[illegible]	.514
5. % Hispanic	52	10.9	41.1	-.05	- -2.055
6. % Other minority	5.0	3.9	1.1	-.01	- 0.01
7. % Dropout	26.5	23.7	2.8	.02	0.06
8. % UI claimant	1.0	1.0	-0-	.62	-0-
9. % Welfare recipient	31.1	32.1	- 1.0	-.18	0.18
10. Average wage for area (000)	16.3	15.3	1.0	.02	0.02
11. Unemployment rate	17.7	9.0	8.7	-.50	- 4.35
				TOTAL ➤	5.31

L. National Departure Point (National Average Performance Level)	28.71		
M. Model-Adjusted Performance Standard	34.021		
N. Parameters Limits	(+) 20 (-) 50		
O. Governor's Adjustment Factor	( ) X pts./5		
P. Performance Standard	*Local SDA data base was not accurate to estimate [illegible] of this factor. National average		

. Department of Labor. Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name

COUNTY OF LOS ANGELES

B. SDA Nu

erformance Period

Y ____________

D. Type of Standard
☐ Plan
☐ Recalculated

Date Calculated ____________

E. Performance Measure

Welfare Entered Employment Rate (Ad

Model-Adjusted Performance Standard for the Adult Entered Employment Rate.	38.59%
SDA (State) Welfare Entered Employment Rate Ratio	.75
Welfare Entered Employment Rate	22.4%
Model-Adjusted Performance Standard	22.4%
Parameters Limits	(+) 13 (-) 17
Governor's Adjustment Factor	% pts./$ ( )
SDA Performance Standard	/

297

Exhibit E

BUDGET

County of Los Angeles
Service Delivery Area

Plan Registration No.

Modification No.

TITLE IIA FUNDING

1. Base Allocation	12,481,533
2. Additional Funds (Identify sources)	-0-
3. Decrease in funding	-0-
Net Funds Available	12,481,533

PLANNED COST

Limitation on cost categories

a. Training costs must be at least 70% of total allocation.

b. Total Participant Support costs and Administration costs may not exceed 30% of total allocation.

c. Administration costs may not exceed 15% of total allocation.

1. Training Funds	8,737,087
2. Participant Support Funds	1,872,223
3. Administration funds	1,872,223
Total Allocations	12,481,533

(1 + 2 + 3 must equal Total Allocation)

TRAINING

CUMULATIVE BUDGET SUMMARY

CHART XI

Total Allocation 8,737,087

First Year Planned Expenditure $12,481,553

Activity	First Quarter 12/	Second Quarter 3/	Third Quarter 5/	Fourth Quarter 8/
1 CLASSROOM TRAINING (REMEDIAL/BASIC)	436,855	655,282	873,709	
2 CLASSROOM TRAINING (OCCUPATIONAL)	1,943,128	2,914,692	3,886,256	
3 ON-THE-JOB TRAINING	534,710	802,065	1,069,420	
4 OTHER EMPLOYER BASED TRN'G. (JTPA S204 #s6,7,12,24,28)	-0-	-0-	-0-	
5 Work Experience (50%)	684,988	102,748	1,369,975	
6 Exemplary Youth Programs	512,576	1,025,151	1,537,727*	
7 Training-Related Participant Services	-0-	-0-	-0-	
8 Training-Related Employer Services	-0-	-0-	-0-	
9 Total Obligation	4,112,257	5,499,938	8,737,087	
A. PERFORMANCE BASED CONTRACTS	3,599,680	5,399,520	7,199,360	

* This figure represents a maximum amount which may be spent for exemplary youth programs. Since the County will emphasize services to [illegible]21 year old youth, this figure may be reduced accordingly.

[illegible] PROGRAM

CUMULATIVE BUDGET SUMMARY

CHART XII

Total Allocation $12,481,553

First Year Planned Expenditure $12,481,553

Activity	First Quarter 12/	Second Quarter 3/	Third Quarter 6/	Fourth Quarter 9/
1 ADMINISTRATION Total Obligation	624,078	1,248,155	1,872,233	-0-
2 PARTICIPANT SUPPORT TOTAL OBLIGATION	936,117	1,404,175	1,872,233	-0-
3 TRAINING TOTAL OBLIGATION (LINE 10, chart XI)	4,112,257	5,499,938	8,737,087	-0-
4 PROGRAM TOTAL OBLIGATION (1, 2, AND 3)	5,672,452	8,152,268	12,481,553	-0-

	BUDGET CONTROL	CHART XIII
	Amount	Percent
Adult Services	6,989,670	56%
Youth Services	5,491,883	44%
Total	12,481,553	100%

#5583

AGREEMENT BETWEEN THE BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES AND THE PRIVATE INDUSTRY COUNCIL

This agreement made and entered into by and between the County of Los Angeles and the Private Industry Council.

WITNESSETH:

WHEREAS, the Job Training Partnership Act (29 U.S.C. 1501 et. seq., Public Law 97-300, 96 Stat. 1322) authorizes the expenditure of Federal funds for job training programs in established Service Delivery Areas (SDA's); and

WHEREAS, the County of Los Angeles has been designated as an SDA for its unincorporated areas and certain of its cities; and

WHEREAS, the Board of Supervisors are the Chief Elected Officials of such SDA; and

WHEREAS, the Job Training Partnership Act establishes the Private Industry Council and the Chief Elected Officials as local participants in the implementation of the Job Training Partnership Act; and

WHEREAS, the parties desire to enter into an agreement to provide job training and job placement services to the eligible residents of Los Angeles County; and

WHEREAS, the County Department of Community Services has the proven expertise to establish and implement such job training and placement programs;

NOW, THEREFORE, IT IS MUTUALLY AGREED:

1. Purpose

   The purpose of this agreement is to establish a basic framework for the implementation of the Job Training Partnership Act in Los Angeles County during the nine-month transition period established in the Act.

2. Private Industry Council

In partnership with the Board of Supervisors, the Los Angeles County Private Industry Council (PIC) will provide policy guidance and exercise oversight with respect to activities under the County's Job Training Plan.

In carrying out these responsibilities, the PIC will function generally as a Board of Directors, setting policy and standards, then reviewing and evaluating progress toward program goals. Within this focus, the PIC will emphasize the private sector outreach and liaison activities for which it is uniquely qualified.

3. Grant Recipient and Administrative Entity

The Board of Supervisors and the Private Industry Council designate the County of Los Angeles as the JTPA grant recipient and jointly appoint the County Department of Community Services as the administrative entity on behalf of the County and the PIC, for all JTPA programs operated within the County's Service Delivery Area.

4. Development of the Job Training Plan

Pursuant to the provisions of JTPA and in compliance with State and Federal regulations, the Los Angeles County Department of Community Services shall develop the Job Training Plan and contractor funding recommendations for the review and approval of the Private Industry Council and the Board of Supervisors. Upon the approval and signatures of the PIC Chairperson and the Chairman of the Board of Supervisors, the Job Training Plan will be submitted to the Governor for approval.

5. Term of Agreement

The term of the Agreement shall commence on the 20thday of September, 1983, and shall continue in force until June 30, 1984.

6. Amendments

Either PIC or the County may propose amendments to this Agreement at any time during the term of this Agreement, by providing to the other party, a written notice defining the specifics of the proposed amendment(s). All amendments to this Agreement shall require approval by the PIC, and the Board of Supervisors, and must be in written form and executed by the appropriate authorized parties.

IN WITNESS WHEREOF, the Board of Supervisors of the County of Los Angeles has caused this Contract to be subscribed by its Chairman and the seal of said Board to be hereto affixed and attested by the Executive Officer-Clerk of the Board of Supervisors hereof, and the Private Industry Council has subscribed the same through its authorized officer, the day, month, and year first above written.

Chairperson
Private Industry Council

Chairman
Board of Supervisors

ATTESTED:

RICHARD A. SCHOENI,
Assistant Executive Officer
Clerk of the Board of Supervisors

By Patricia Polk
DEPUTY

APPROVED AS TO FORM
JOHN H. LARSON, County Counsel

By

ADOPTED
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

78 SEP 20 1983

Richard A. Schoeni
RICHARD A. SCHOENI
ASSISTANT EXECUTIVE OFFICER

Rev. 8/30/83

SERVICE DELIVERY AREA FIELD LIAISON GUIDE
- OVERVIEW -

A. INTRODUCTION

1. Goals and Objectives of the Liaison Function

The Liaison function's primary goal is to assist SDAs achieve their employment and training goals and objectives.

2. Purpose of Guide

The Liaison Guide is a set of instructions intended to assist Liaison staff perform their function.

3. Field Liaison Responsibilities

The Field Liaison is responsible for ensuring that SDAs receive the assistance they need to meet their goals, objectives and performance standards.

B. PROGRAM PERFORMANCE

1. Administrative/Management Systems

a. The administrative/management systems will be reviewed to: (1) ensure SDAs will be able to meet the requirements outlined in the Federal regulations and the Job Training Plan; and (2) to determine if program performance is impacted by the SDAs' management system.

b. The areas of assistance/review include:

(1) Policy and Procedures

The policy and procedures will be reviewed to assist the SDAs in establishing procedures and/or systems which will meet prescribed guidelines, increase their operational efficiency and effectiveness in meeting goals and objectives. The areas to be reviewed include:

(a) SDA Planning
(b) Systems
(c) Internal Controls

(2) Fiscal Accountability

The fiscal accountability of the SDAs will be reviewed to: (1) ensure the accounting systems are adequate to account for Federal funds; (2) ensure administrative controls are sufficient to safeguard these funds; and (3) ensure that procedures/methods meet audit standards. The areas to be reviewed include:

(a) Accounting System
(b) Cash Controls
(c) Fiscal Reporting System

(3) Organization

The SDAs organization and utilization of resources will be reviewed in order to assist the SDAs meet their goals and objectives in an efficient and effective manner. The areas to be reviewed include:

(a) Utilization of program resources
(b) Utilization of community resources

2. Training/Services Program

a. The training and services programs will be reviewed to: (1) ensure that SDAs are providing eligible individuals vocational education, job training and employment services needed to obtain private sector employment; (2) ensure training providers are responsive to the needs of employers; (3) ensure training programs are developed so that eligible participants are provided with equal access to programs and services; (4) assist SDAs in identifying potential problem areas in their training/services programs; and (5) identify exemplary programs which may be replicated in other areas.

b. The areas of assistance/review include those training and services programs for the following individuals:

(1) Economically disadvantaged (JTPA, Section 203(a)(1)).

(2) Youth (JTPA, Section 203 (b)(1)).

(3) AFDC/Manpower Registrants (JTPA, Section 203(b)(3)).

(4) School Dropouts (JTPA, Section 203 (b)(3)).

(5) Other substantial segments, such as eligible females, older workers, disabled individuals, veterans, and Whites, Blacks, Hispanics, Native Americans, Asians or Pacific Islanders (JTPA, Section 141(a)).

(6) Nondisadvantaged (JTPA, Section 203(a)(2)).

c. The areas/indicators of potential problems in the training and services programs will be reviewed to determine whether SDAs are meeting their established goals and objectives. There are several areas/indicators which will assist the Field Liaison in determining whether a problem exists, and the magnitude of the problem. These areas/indicators include:

(1) Performance standards
(2) Participant characteristics
(3) Summary of expenditures

(4) Grievances and complaints
(5) SDA self-evaluation and subrecipient monitoring

C. PROGRAM REVIEW PROCESS

1. Pre-onsite Study--to identify areas where technical assistance is needed.

   a. Review of documentation

      In order to effectively identify areas of technical assistance, the Liaison staff must be thoroughly familiar with the following documents:

      (1) SDA Plan
      (2) MIS
      (3) Regulations/Policies
      (4) Correspondence

   b. Preparation for Onsite Review

      (1) Review Field Liaison Guide
      (2) Schedule onsite review
      (3) Compile onsite package documents

2. Onsite Review

   a. Onsite reviews will be conducted in order to assist SDAs:

      - Determine extent of program implementation and identifying problem areas.

      - Determine what training is being provided and whether the training is meeting the goals/objectives outlined in the Job Training Plan.

- Determine the impact of the PIC on SDAs' program operation.

- Validate MIS by spot checking systems to determine accurate reporting of performance statistics and expenditures of funds.

- Prepare for a financial audit.

- Identify other factors influencing performance, such as economic conditions, geographic location and demographics.

b. The onsite review allows the Field Liaison to observe program operations and verify data reviewed in the pre-onsite study. The major activities which occur during the onsite review are:

- Entrance conference
- Records review
- Interviews
- Observation
- Exit conference

c. The Field Liaison should provide and/or recommend technical assistance for problems apparent during the onsite review.

d. The Field Liaison should assist SDA administration in identifying corrective action needs and in developing a corrective action plan.

3. Prepare Written Report

4. Follow-up

D. APPENDIX

1. Administrative/Management Systems Survey Guide
2. Assessment Workbook
3. Interview Questionnaires
4. Report Format

SERVICE DELIVERY AREA FIELD LIAISON GUIDE

A. INTRODUCTION

1. Goals and Objectives of Liaison Function

The Liaison function's primary goal is to assist SDAs achieve the goals and objectives stated in the Interim Plan and Subgrant Agreement and Governor's Goals and Objectives. The Liaison Unit is to accomplish this by:

- Assisting SDAs in identifying and correcting problems by providing alternatives for corrective action and technical assistance needs involving program planning, performance, administrative/management and fiscal systems.
- Creating and maintaining cooperative relationships with SDA representatives, PIC members, CEOs, etc.
- Identifying technical assistance needs in day-to-day operations and arrange for technical assistance, through JTPO or other agencies as needed, for long-term or specialized needs.
- Acting as the primary state level contact for SDA representatives.

2. Purpose of Guide

The Liaison Guide has been developed to assist the Liaison staff through the various stages of Liaison function. The Guide outlines a systematic approach to identifying the SDAs technical assistance needs and provides methods for correcting problems.

3. Field Liaison Responsibilities

The Field Liaison is responsible for ensuring that the SDAs receive the assistance they need to meet their goals, objectives and performance standards. This is to be accomplished by:

- Identifying technical assistance needs, in day-to-day operations and long-term major areas, and arrange for technical assistance through JTPO or other agencies as needed.

- Identifying those systems or procedures or programs which can be exported to other SDAs.

- Preventing fraud and abuse by verifying that JTPA funds are being spent according to the provisions of JTPA and FESA.

- Assisting SDAs in preparing for bi-annual audits by ensuring that systems are designed to account for JTPA funds expenditures and that these funds are used in accordance with the provisions of JTPA and FESA.

B. PROGRAM PERFORMANCE

1. Administrative/Management Systems

a. Purpose of Assistance/Review

The administrative/management systems will be reviewed to: (1) ensure SDAs will be able to meet the requirements outlined in the Regulations and the Job Training Plan; and (2) determine if program performance is impacted by the SDAs' management systems.

b. Areas of Assistance/Review

(1) Policy and Procedures

The policy and procedures will be reviewed to assist the SDAs in establishing procedures and/or systems which will meet prescribed guidelines, increase their operational efficiency and effectiveness in meeting goals and objectives. The areas to be reviewed include:

(a) SDA Planning

- -- Job Training/Coordination Plans
- -- SDA Needs Assessment
- -- Coordination

(b) Systems

- -- Recruitment
- -- Eligibility
- -- Selection of Service Providers
- -- Grievance/Complaint Procedures

(c) Internal Controls/Self-Evaluations

- -- Subrecipient Monitoring
- -- Technical Assistance
- -- Corrective Action
- -- Follow-up

(2) Fiscal Accountability

The fiscal accountability of the SDAs will be reviewed to: (1) ensure the accounting systems are adequate to account for Federal funds; (2) ensure administrative controls are sufficient to safeguard these funds; and (3) ensure that procedures/methods meet audit standards. The areas to be reviewed include:

(a) Accounting System

- -- General Accounting and Administrative Procedures

(b) Cash Management/Controls

- -- Cash Receipts
- -- Cash Disbursements
- -- Payroll
- -- Participant Payroll
- -- Purchasing
- -- Receiving and Accounts Payable
- -- Matching Requirements

(c) Fiscal Reporting System

(3) Organization

The SDAs' organization and utilization of resources will be reviewed to assist the SDAs meet their goals and objectives in an efficient and effective manner. The areas to be reviewed include:

(a) Utilization of program resources
(b) Utilization of community resources

The provisions or aspects applicable to each administrative/management system are detailed in Attachment 1. Each questions in each section will elicit responses which provide a basic review and check of the SDAs' systems, and will indicate areas which may be improved or modified to increase the SDAs' performance.

2. Training/Services Programs

a. Purpose of Assistance/Review

The training and services programs will be reviewed to: (1) ensure that the SDAs are providing eligible individuals vocational education, job training and employment services needed to obtain private sector employment; (2) ensure training providers are responsive to the needs of employers by providing programs which will meet employers' current and future job demands; (3) ensure training programs are developed so that eligible participants are provided with equal access to available programs and support services; (4) assist SDAs in identifying potential problem areas in their training/services programs; and 5) identify exemplary programs which may be replicated in other areas.

b. Areas of Assistance/Review

The training/services programs operated by the SDAs will be reviewed to ensure the goals and objectives listed above are met, as well as the goals listed in the Job Training Plan and Job Training Partnership Act. In addition, the programs will be reviewed to ensure the SDAs are providing employment and training opportunities to those individuals who can benefit from, and who are most in need of, such opportunities. The programs to be reviewed include those for the following individuals:

(1) Economically Disadvantaged (JTPA, Section 203(a)(1)).

(2) Youth--at least 40 percent of Title IIA resources must be expended for individuals aged 16 through 21 years (JTPA, Section 203(b)(1)).

(3) AFDC/Manpower Registrants--Recipients of Aid to Families with Dependent Children (AFDC) who are required to, or who have registered under Section 402(a)(1a) of the Social Security Act are to be served at least in proportion to the ratio of such individuals in the SDA to the number of economically disadvantaged individuals 16 years old or older in the area (JTPA, Section 203(b)(3)).

(4) School Dropouts--Eligible individuals, who are neither attending any school nor subject to any attendance law and who have not received a secondary school diploma or a certificate from a program of equivalency for such a diploma, are to be served in proportion to the ratio of such individuals to the number of economically disadvantaged individuals 16 years or older in the area (JTPA, Section 203(b)(3)).

(5) Other substantial segments, such as, eligible females, older workers, disabled individuals, veterans, and Whites, Blacks, Hispanics, Native Americans, Asians or Pacific Islanders are to be provided equitable levels of services (JTPA, Section 141(a)).

(6) Nondisadvantaged--Up to 10 percent of the participants in all programs may be individuals who are not economically disadvantaged if such individuals are experiencing barriers to employment, as stipulated in JTPA, Section 203(a)(2).

c. Areas/Indicators of Potential Problems

The areas/indicators of potential problems in the training and services programs will be reviewed to determine which SDAs are meeting their established goals and objectives. There are several areas/indicators which will assist the Field Liaison in determining whether a problem exists, and the magnitude of the problem. The areas/indicators include:

(1) Performance Standards

The performance standard is a basic measure of performance for training programs under JTPA Section 106. Seven performance standards have been prescribed to measure progress toward meeting the objectives of the programs. These standards are to be adjusted for each SDA to account for various local conditions. The seven performance standards are:

Adult

- Placement in unsubsidized employment.

- Retention in unsubsidized employment.

- Increase in earnings.

- Reduction in the number of individuals and families receiving cash welfare payments and the amounts of such payments.

Youth

- Attainment of recognized employment competencies recognized by the Private Industry Council.

- Elementary, secondary, and post-secondary school completion, or the equivalent.

- Enrollment in other training programs or apprenticeships, or enlistment in the Armed Forces.

Initially, the Field Liaison should ensure the SDA has calculated the performance standards correctly. Next, the adjusted standards (planned performance) should be compared to actual performance by completing Chart A in the Assessment Workbook (Attachment 2). The Field Liaison should consider conducting a more extensive review when a SDA does not meet a performance standard, in order to determine if a problem exists. The Assessment Workbook provides a comprehensive approach to problem identification.

(2) Participant Characteristics

Participant characteristics are contained in:

- SDA Plan—Participant Program Plan (Exhibit D in Job Training Plan); program narratives (potential eligible populations and clients to be served); population characteristics (Chart CI in Job Training Plan).
- SDA Quarterly Reports—Participant characteristics summary.

Participant characteristics and outcomes may indicate potential problems when compared to SDA needs assessment and goals and objectives. The Field Liaison should review the participant characteristics in the SDA plan and quarterly reports to determine whether discrepancies are apparent in the following areas:

- Equitable services being provided among substantial segments of the population;
- Outcomes (entered employment and other terminations) correspond to the needs assessment and goals; and
- Degree of service parity to special groups, e.g., school dropouts, AFDC registrants, handicapped, veterans, youth, etc.

(3) Summary of Expenditures

Summary of expenditures are reported in the quarterly reports. Expenditures are reported for program and administration. Program expenditures are subdivided by training and participant support. The workbook provides steps in determining potential problems by examining:

- Expenditure patterns for Titles IIA, IIB, III, and other categories to determine whether requirements are being met pursuant to JTPA, Sections 103, 108, 202 and, other applicable sections.

- Whether expenditures in excess of the limitations contained in JTPA, Section 108 are justified on the basis of high unemployment, high cost of child care and transportation and substantial numbers of participants in long-term training programs.

Refer to Chart B and the accompanying questions in the Assessment Workbook for analyzing expenditures.

(4) Grievances/Complaints

Grievances/complaints can be reported to program operators, SDA administration, the Council, etc. after reviewing the nature, frequency, and area of the grievance/complaint determine whether a potential problem exists. The Administrative/Management Survey Guide (Attachment 1) outlines steps to analyze specific areas such as:

- Rights of participants in the complaint process;
- Adequacy of hearings conducted on grievances (time frames, location etc.); and
- Procedures for dealing with grievances.

(5) SDA Self-evaluation and Subrecipient Monitoring

The degree to which programs will be monitored will vary among SDAs. However, the PIC and SDA are responsible for providing oversight of activities conducted under JTPA. The results of oversight activities (monitoring and evaluating) may provide information necessary to complete the review process contained in this guide.

C. PROGRAM REVIEW PROCESS

Introduction

The review process consists of:

Pre-onsite study, onsite review, preparing written reports and follow-up.

The program review process suggests areas of review to identify and resolve problems. By following the procedures and general instructions, the Field Liaison should be able to accurately identify the technical assistance needs of the SDA. The Assessment Workbook (Attachment 2) sections are referenced in the guide and provide a more detailed approach to identifying causes of problems and methods for developing solutions to these problems.

1. Pre-onsite Study

a. Review of documentation

In order to effectively identify areas of technical assistance, the Liaison staff must be thoroughly familiar with the SDA's Plan, current and past MIS reports, other prior reports, correspondence, regulations and other information. Conducting a pre-onsite study provides the Field Liaison with written information about a program or situation.

Review of narrative information and quantitative data will indicate potential problem areas and provide a focus for onsite activities. The following areas should be reviewed:

(1) SDA Plan:

Goals and objectives, performance standards, participant program plan, Job Training/Coordination Plan needs assessment, planned coordination, budget plan.

(2) MIS:

Quarterly Reports--Enrollment and Termination Summary, Summary of Expenditures, and Participant Characteristics.

(3) Regulations/Policies:

Current regulations, policy bulletins, DOL bulletins, FOD's, etc. as a basis for review of program performance, and administrative/management issues.

(4) Correspondence:

Issue memos, decisions, corrective action, letters, etc., between JTPO, SJTCC and the SDA and program operators.

b. Preparation for Onsite Review

(1) Review Field Liaison Guide

(2) Schedule onsite review (entrance conference, interviews)

(3) Compile onsite package documents which include:

-- Questionnaires

-- MIS reports.

2. Onsite Review

a. Onsite reviews will be conducted in order to assist SDAs:

- Determine extent of program implementation and to identify problem areas.
- Determine what training is being provided and whether the training is meeting the goals/objectives outlined in the Job Training Plan.
- Determine the impact of the PIC on SDA's program operation.
- Validate MIS by spot checking systems to determine accurate reporting of performance statistics and expenditures of funds.
- Prepare for a financial audit.
- Identify other factors influencing performance, such as economic conditions, geographic location and demographics.

b. The onsite review allows the Field Liaison to observe program operations and verify data reviewed in the pre-onsite study. The major activities which occur during the onsite review are:

- Entrance Conference
- Records Review
- Interviews
- Observation
- Exit Conference

(1) Entrance Conference

During the entrance conference, the purpose, scope and schedule of activities should be discussed. The Field Liaison should confirm the schedule, interviews and other arrangements made during the onsite preparation. In addition, the Field Liaison may also find it beneficial to secure the location of records and staff at this time.

(2) Records Review

An onsite review of records serves a number of purposes including the validation of pre-onsite statistical data and the identification of potential problem areas which may require closer review.

The following should be considered depending on the purpose of the review:

(a) Administrative Records

These records should be reviewed to determine the administrative and organizational structure within the SDA. Staff job descriptions and personnel procedures should be reviewed to determine which staff and approach is used by the SDA in directing and coordinating program operations.

(b) Contract Files

The contracts should be reviewed to determine the SDA's goals and objectives, performance standards, participant program plan, coordination and linkages, operational systems and procedures, and budget plan.

(c) Participant Files

The participant files should be reviewed to determine:

(a) Whether participants meet eligibility criteria;

(b) The participants' needs and to determine whether training/service plan is appropriate; and

(c) Whether SDAs are meeting their significant segment/EEO goals.

(d) EEO Records

These records should be reviewed to determine whether SDAs have adequate grievance and complaint procedures and to assess whether SDAs are serving the significant segments as planned.

(e) Fiscal Records

These records should be reviewed to determine whether SDAs have financial systems which meet Federal and State audit standards, and to ensure financial systems meet the accounting needs of the SDA.

(3) Interviews

Through interviews with the administrative and program staff, participants, and employers, the Field Liaison is able to gain valuable information concerning the dynamics of program administration and operations.

Many factors contribute to the success of an interview. The Field Liaison should ensure the following have been determined:

(a) Be sure you are clear as to the purpose of the interview and determine what areas of information/data you need to secure.

(b) Determine what questions you will ask to elicit such information.

(c) Review questionnaires for adequacy. Do not restrict yourself to the prepared questions.

(d) At the close of the interview, recap the major points with the interviewee. Make sure there is a common understanding of these major points.

Interview questionnaires to be used are in Attachment 3.

(4) Observation

Through observation, the Field Liaison can get a "feel" for a particular situation and make an initial assessment of it. It is important to keep in mind that observations lead to an initial perception or judgment, which must then be validated. A careful analysis is essential to ensure that findings are fair and objective.

Observation in the program performance areas will assist the Field Liaison to determine the impact of the overall SDA program.

(a) The Field Liaison should observe areas/aspects which are common to the worksites, intake centers, institutional classrooms and administration centers. These include:

- Health and safety provisions (OSHA assurance, certification and regulations)
- Location--accessibility to clients and public transportation
- Working/learning environment--conducive to increasing the participants' learning experience
- EEO provisions for staff and participants
- Property

(b) In addition to the areas listed above, the Field Liaison should observe specific areas which include:

- o **Worksites**
  - — Supervision
  - — Equipment
- o **Intake Centers**
  - — Logs which contain characteristics on all applicants
- o **Institutional Classrooms**
  - — Participant characteristics (race, sex, etc.)
  - — Equipment
  - — Attendance
- o **General Administration**
  - — Reception
  - — Confidentiality of records

(5) **Exit Conference**

The Field Liaison should conduct an exit interview to discuss the major findings, recommendations and corrective actions which resulted from the onsite review. These areas should be discussed with pertinent individuals in the SDA which may include:

- — PIC members
- — SDA administrators
- — Program staff
- — Program operators

The Field Liaison should discuss findings and explain alternatives for resolving identified needs/problems; timelines for resolving problems should be established and agreed upon. If problems can be resolved through technical assistance, the Field Liaison should indicate who will provide the assistance and the approximate date this assistance will be provided. If problems are of greater magnitude, the Field Liaison should indicate the need for developing corrective action plans, procedures and the approximate date the actions are to be completed.

c. The Field Liaison should provide and/or recommend technical assistance for problems apparent during the onsite review.

- If minor assistance needs or problem areas are identified during onsite review, the Field Liaison should provide the needed assistance immediately.

- If assistance needs or problem areas are complex or require specialized expertise, the Field Liaison will arrange for the JTPO Technical Assistance Unit to provide the necessary assistance and/or information.

To determine whether any areas require in-depth review assistance, refer to assessment workbook in appendix as needed.

d. The Field Liaison should assist SDA administration in identifying corrective action needs and in developing a corrective action plan.

- The steps which may be involved in the problem correction process are:

  (1) Establish objectives to be accomplished.
  The corrective action plan objectives should be written and agreed upon and should be measurable.

(2) Prioritize the objectives. The accomplishment of certain objectives may be critical to the corrective action plan where others may be desirable but not critical.

(3) Develop several alternative approaches to the solution of the problem. Consideration may be given to using other resources or units within EDD.

(4) Analyze and evaluate each alternative in terms of ease of implementation-time, cost, staffing, materials, political implications and overall organizational benefit. The possible negative effects should also be identified and weighed.

(5) Select the best alternative(s) and develop the appropriate systems, training materials, commitment, letters, etc., prior to implementation of corrective action.

(6) Implement the corrective action plan and monitor closely to determine the overall efficiency and effectiveness of the corrective action, as well as to control for any unwanted or negative effects.

3. Prepare Written Report

Refer to Attachment 4 for report format.

4. Follow-up

a. Verify technical assistance.

b. Determine extent of corrective action taken and its impact.

c. Determine additional needs for technical assistance and/or corrective action.

D. APPENDIX

1. Administrative/Management Systems Survey Guide

2. Assessment Workbook

3. Interview Questionnaires

4. Report Format

Attachment A
22:008:

ADMINISTRATIVE/MANAGEMENT SYSTEMS
SURVEY GUIDE

The Survey Guide outlines areas of review and/or concern in SDA administrative and management systems. The questions in each section will elicit responses which provide a basic review and check of the SDAs' systems, and will indicate areas which may be improved or modified to increase the SDA's performance.

A. Policy and Procedures

1. SDA Planning

This section is included to determine if the elements described in the Job Training Plan are occurring as planned, and if the process used by the SDA to formulate the plan meets requirements outlined in JTPA.

Job Training/Coordination Plans (JTPA, Section 104)

a. What training and services described in the plan are being provided?

Comments ______________________________________
____

b. Identify the average duration of training and services and the estimated cost per participant.

Comments ______________________________________
____

c. What procedures have been established for identifying and selecting the target groups described in the Job Training Plan?

Comments ______________________________________
____

d. Are procedures established for the preparation and submission of an annual report to the State which includes characteristics of the participants? Briefly describe.

Yes ____ No ____

Comments ____

____

e. Identify the performance goals established in accordance with standards prescribed under Section 106.

Comments ____

____

f. Describe the procedures for selecting service providers (Section 107), which take into account past performance in job training or related activities, fiscal accountability, and ability to meet the performance standards.

Comments ____

____

g. Is the budget for two program years, and any proposed expenditures for the succeeding two program years in such detail to meet the requirements of Section 108 which outlines the limitations on certain costs?

Yes ____ No ____

Comments ____

____

h. Describe the procedures established for complying with the coordination criteria contained in the Governor's Coordination and Special Services Plan.

Comments ____

____

i. If there is more than one Service Delivery Area in a single labor market area, describe the procedures established for coordinating particular aspects of individual Service Delivery Area programs.

Comments ____

____

j. Has the SDA established fiscal control, accounting, audit and debt collection procedures to ensure the proper disbursal of, and accounting for, funds received under this title? Briefly describe.

Yes _____ No _____

Comments ____

____

SDA Needs Assessment

a. Does the SDA have a needs assessment process which adequately identifies the employment and training needs for the area? Consideration should be given to:

o Participant Needs

-- training in demand occupations
-- job seeking skills
-- support services
-- career guidance
-- increased wages

-- increased self-esteem/confidence
-- basic skills required to obtain job
-- complete/continue education
-- other personal development needs

Yes ____ No ____

Comments ____

____

o **Employer Needs**

-- specific training, skills or behavior
-- monetary or other reimbursement for training
-- trained labor pool available when needed

Yes ____ No ____

Comments ____

____

o **Community Needs**

-- increased economic development activities
-- improved/increased housing
-- increased social/other community services

Yes ____ No ____

Comments ____

____

b. Describe SDAs needs assessment process and findings.

Coordination

a. Describe the procedures established by the SDA for coordinating with and making use of other agencies and orgainzations that provide job training, vocational and remedial education, and client advocacy. Identify those agencies (if any) and the services they will provide.

Comments ____

____

b. Describe the procedures established by the SDA for coordinating with the State and local educational agencies through cooperative agreements funded by State Education Coordination Grant. Identify these agencies (if any) and the services they will provide.

Comments ____

____

c. Describe the procedures established by the SDA for coordinating with and making use of the local EDD Office's Job Service in planning and delivering services to the eligible population.

Comments ____

____

d. Describe the procedures established by the SDA for coordination with the county welfare system.

Comments ____

____

e. Describe the procedures established by the SDA for coordinating with service providers operating under JTPA Titles III and IV.

Comments ______________________________
____

2. Systems

Recruitment

a. Has the SDA developed comprehensive recruitment procedures to include participation of the required persons/groups? Briefly describe.

Yes _____ No _____

Comments ______________________________
____

Eligibility Determination Process

a. General Requirements (Section 141(1) and 203)

(1) Does the Job Training Plan include procedures for identifying and selecting participants and for eligibility determination and verification? Briefly describe those procedures.

Yes _____ No _____

Comments ______________________________
____

(2) Describe the controls and procedures which have been developed to ensure that each participant:

(a) Is a U.S. citizen or national, a lawfully admitted permanent resident alien, a lawfully admitted refuge or parolee, or other individual authorized by the Attorney General to work in the U.S.

Comments

(b) Is a resident of the SDA or meets an exception in the Job Training Plan.

Comments

(c) Has complied with draft registration laws.

Comments

(3) Describe the procedures which have been developed to ensure that no more than 45 days elapse between the date of application and enrollment, or a new application is taken.

Comments

(4) What procedures and controls have been developed to ensure that each participant under Title II is either economically disadvantaged or has encountered barriers to employment?

Comments

(5) What procedures have been developed to ensure that no more than 10 percent of all participants in the SDA are not economically disadvantaged?

Comments ____

____

(6) Describe the procedures and controls that have been developed to ensure that each participant in a program for Older Individuals:

-- is economically disadvantaged
-- has attained 55 years of age

Comments ____

____

b. Exemplary Youth Programs

Describe the procedures and controls that have been developed to ensure that participants in exemplary youth programs meet the special requirements for eligibility for the following programs:

(1) Education for employment programs

(a) Participants are youths who have not received high school diplomas, or have educational deficiencies despite attainment of diplomas.

Comments ____

____

(b) Priority given to individuals who do not meet established levels of academic achievement and who plan to enter full-time labor market upon leaving school.

Comments ____

____

(2) Entry employment experience programs

(a) Participants have completed preemployment skills training or its equivalent.

Comments ______________________________

____

(b) Participants have not recently held regular part-time or summer jobs for more than 250 hours paid employment (unless this requirement is waived by Job Training Plan).

Comments ______________________________

____

(c) Participants are enrolled in a secondary school or an institution offering a certified high school equivalency program and are meeting or have met the minimum academic and attendance requirements of that institution during the current or most recent term.

Comments ______________________________

____

(d) Priority given to youth not planning to continue on to post secondary education.

Comments ______________________________

____

(3) School-to-work transition assistance programs

(a) Dropouts, with follow-up as immediately as possible after leaving school.

Comments ______________________________

____

(b) Participants are youths who are high school seniors who plan to enter the full-time labor market upon graduation.

Comments ____

____

c. Dislocated Workers (Title III)

(1) Describe the procedures and controls that have been developed to ensure that participants under Title III for dislocated workers meet one of the following requirements:

- Workers terminated or laid-off, or have received notice thereof, are eligible for or have exhausted their entitlement to unemployment compensation, and are unlikely to return to their previous industry or occupation.

Comments ____

____

- Workers terminated or who have received notice there of as a result of any permanent closure of a plant or facility.

Comments ____

____

- Long-term unemployed who have limited opportunities for employment or reemployment in the same or similar occupation in the area in which such individuals reside, including any older individual who may have substantial barriers to employment by reason of age.

Comments ____

____

d. Describe the procedure and controls that have been developed to ensure that participants under Summer Youth Programs meet one of the following requirements:

- o Economically disadvantaged youths.

Comments ______________________________

____

- o Eligible individuals aged 14 or 15 (if Job Training Plan has provided for this)?

Comments ______________________________

____

e. Describe the controls and procedures in place to ensure that subsidized employment with any private-for-profit employer is limited to individuals who are economically disadvantaged youths and the employment is provided in accordance with Section 205.

Comments ______________________________

____

f. What controls and procedures have been developed to ensure that for each participant the following information has been obtained:

- -- Personal identifying information? (PL 97-300, Sec. 104(b)(3))
- -- Work history?
- -- Family size?
- -- Family income? (PL 97-300 Sec. 4(8))
- -- Participant's income?
- -- Whether the participant is receiving food stamps pursuant to Food Stamp Act of 1977?
- -- Whether the participant is a foster child on behalf of whom State or local government payments are made?

-- Participant's age?
-- Whether the participant is handicapped?
-- Whether participant receives, or is a member of a family which receives, cash welfare payments?
-- Other JTPA/CETA activities participated in?
-- Other JTPA/CETA supportive services received?
-- JTPA/CETA earnings records?

Comments ____

g. What procedures have been developed to retain all records pertinent to documentation of eligibility and development of statistical information regarding eligibility?

Comments ____

h. What procedures have been developed to document and support locally developed formulas or procedures for needs-based payment?

Comments ____

o How do such procedures provide for the maintenance of individual records of determination of the need for, and amount of, any participant's needs-based payments?

Comments ____

o Do procedures provide for verification of participant supplied information? Briefly describe.

Yes _____ No _____

Comments ____

- Do procedures provide for supervisory review of determinations of needs-based payments? Briefly describe.

Yes ____ No ____

Comments ______________________________

____

Selection of Service Providers (Section 107)

a. Describe the procedures the SDA has developed for the selection of service providers based on demonstrated performance which considers the effectiveness of the agency or organization:

(1) In delivering comparable or related service.

Comments ______________________________

____

(2) In terms of the likelihood of meeting performance goals, cost, quality of training, and characteristics of participants.

Comments ______________________________

____

b. What procedures has the SDA developed to ensure that community-based organizations are given proper consideration as service providers?

Comments ______________________________

____

c. What procedures has the SDA developed to ensure that funds are not used to duplicate facilities or services available in the area from Federal, State, or local sources, unless it is demonstrated that alternative services or facilities would be more effective or more likely to achieve the SDA's performance goals?

Comments ______________________________

____

d. What procedures has the SDA established whereby appropriate education agencies are given the opportunity to provide educational services (unless the administrative entity demonstrates that alternative agencies or organizations would be more effective or would have greater potential to enhance the participants' continued occupational or career growth)?

Comments ______________________________

____

e. How has the SDA ensured that all occupational skills training programs are in accordance with guidelines established by the Private Industry Council?

Comments ______________________________

____

Grievance/Complaint Procedures (Section 144 of Act)

a. Describe the procedures the SDA has established for grievances or complaints about its programs and activities from participants, subgrantees, subcontractors and interested persons.

Comments ______________________________

____

b. Describe the procedures the SDA has developed for informing participants upon enrollment of:

(1) Complaint procedures.

(2) Complaint filing rights.

(3) Complaint filing process.

Comments ______________________________

____

c. How will the SDA monitor complaint procedures to ensure that:

(1) Complaints and related correspondence are logged and filed.

(2) Assistance is available to complainants in filing.

(3) Availability, coordination, and promptness are inherent in all elements of procedures.

(4) Complainants are notified in writing upon filing and at each stage thereafter of the next procedure to be followed.

Comments ______________________________

____

d. What procedures has the SDA established to ensure that:

(1) Grievance hearings are conducted within 30 days of filing a grievance. (Section 144(a))

(2) Decisions of grievance hearings are made within 60 days after filing a grievance. (Section 144(a))

(3) Complaints do not date back beyond one year of alleged occurence. (Section 144(a))

Comments ______________________________

____

3. Internal Controls/Self-Evaluations

a. Describe the policy/guidelines the SDA has established for self-evaluations which will assist them in determining whether administrative/operational controls and procedures are in place, and meet the requirements of the Regulations and the Act.

Comments ______________________________

____

b. Have written procedures been developed? Briefly describe.

Yes ____ No ____

Comments ______________________________

____

c. Has an organizational entity been established or assignments made to perform self-evaluations? Please identify.

Yes ____ No ____

Comments ______________________________

____

d. Have sufficient staff been assigned to perform self-evaluations? Briefly describe staffing structure.

Yes ____ No ____

Comments ______________________________

____

e. Has an adequate schedule for followup on deficiencies noted in self-evaluations been developed? Describe steps to be taken and time frames.

Yes ____ No ____

Comments ____

____

Subrecipient Monitoring

a. Describe the monitoring procedures established by the SDA to ensure compliance with the Act, Regulations, and provisions incorporated in all subagreements/contracts.

Comments ____

____

b. Describe how the procedures provide for determing whether records are maintained of each participant's enrollment in sufficient detail to demonstrate compliance with eligibility critera.

Comments ____

____

c. How do the precdures provide for determining the following information maintained for each participant:

(1) Family size?
(2) Family income?
(3) Participant income?
(4) Work history?
(5) Food stamp recipient?

(6) Participant is foster child on behalf of whom State or local government payments are received?

(7) Age?

(8) Handicapped?

(9) Other JTPA/CETA activities participated in?

(10) Other JTPA/CETA supportive services received?

(11) JTPA/CETA earnings record?

(12) Receives, or family receives, cash welfare payments?

Comments ______________________________

d. Do the procedures include desk reviews of financial and statistical reports? What areas does the desk review cover?

Yes _____ No _____

Comments ______________________________

e. What procedures have been developed to include followup on deficiencies?

Comments ______________________________

f. Has an organizational entity been established or assignments made to perform monitoring activities? In your response, please answer the following questions:

-- Are responsibilities and duties clearly defined?

-- Are duties assigned to specific individuals?

-- Are responsibilities for scheduling, approving, conducting, reviewing and followup on monitoring adequately separated to provide good internal controls?

-- Is adequate supervision of the monitoring activity provided?

Comments ______________________________

Technical Assistance

a. Describe the procedures developed by the SDA to insure that technical assistance is provided to subrecipients as part of the process of problem correction and problem prevention.

Comments ______________________________

The Field Liaison should consider the internal and subrecipient monitoring findings.

Corrective Action

a. Describe the procedures established by the SDA to ensure that evaluation monitoring, and technical assistance findings are resolved within a reasonable period. In your description of those procedures please answer the following questions:

-- Are procedures and controls in writing?

-- Are duties defined?

-- Are duties assigned to specific individuals?

-- Are duties separated to provide good internal controls?

-- Is the supervision placed at the appropriate level to ensure action is taken?

-- Do procedures require prompt and appropriate corrective action upon becoming aware of any evidence of a violation of the Act or Regulations?

-- Has the SDA developed controls and procedures to ensure that any indications of fraud disclosed through monitoring or other activity are promptly referred to the appropriate regional office of the U.S. Department of Labor's Office of the Inspector General for Investigation?

Comments ____

____

Followup

a. Describe the controls established by the SDA to ensure that corrective actions have occurred by the subrecipients.

-- In addition, SDAs should review and followup on its observations and recommendations of both corrective actions and the results of technical assistance which were not necessarily related to required corrective action.

Comments ____

____

B. Fiscal Accountability

1. Accounting System

General Accounting and Administrative Procedures

a. Review and verify that the SDA has written policies and procedures manuals covering:

- Acounting.
- Personnel.
- Travel.
- General Administration.

Comments ____________________

____

b. Is there an organizational chart which describes actual lines of responsibilities? Please attach to report.

Yes _____ No _____

Comments ____________________

____

c. Do employees have written duty statements?

Yes _____ No _____

Comments ____________________

____

d. Are duties for employees clearly defined?

Yes _____ No _____

Comments ____________________

____

e. Does the organization's system provide that all transactions be:

(1) Supported by written documentation?

(2) Reviewed and approved by an appropriate level of management other than the originator?

Yes ____ No ____

Comments ____

____

f. Review and verify that the SDA has written accounting procedures that require financial reports be taken directly from the books of original entry or linked via clear, complete, well referenced work sheets.

Comments ____

____

g. Does the accounting system provide a mechanism for reporting expenditures on accrual basis?

Yes ____ No ____

Comments ____

____

h. Does the SDA's accounting system provide for identifying receipts and expenditures of JTPA funds seperately for each Title (grant)?

Yes ____ No ____

Comments ____

____

i. Does the accounting system provide for accumulating and recording expenditures for the following cost categories:

- o Training?
- o Participant Support?
- o Administration?

Yes _____ No _____

Comments ______________________________________

____

j. Does the accounting system have the ability to provide an audit trail between supporting documentation and the financial reports?

Yes _____ No _____

Comments ______________________________________

____

k. What procedures have been established for the maintenance and retention of accounting records?

Comments ______________________________________

____

l. Are accounting records retained in a retrievable manner? Please explain.

Yes _____ No _____

Comments ______________________________________

____

m. Describe how accounting duties are separated so that no one individual has complete authority over an entire financial transaction?

Comments ______________________________

____

n. Does the SDA have formal agreements with subcontractors?

Yes ____ No ____

Comments ______________________________

____

o. Are responsible officials covered by fidelity bonds?

Yes ____ No ____

Comments ______________________________

____

p. Does accounting system have the ability to match costs to program objectives? (Section 104(b) (2) of Act)

Yes ____ No ____

Comments ______________________________

____

q. Are all journal entries:

(1) Properly supported and explained?

(2) Approved by the controller, or other responsible officer, prior to entry in the journal?

Yes ____ No ____

Comments ____

____

2. Cash Management/Controls

Cash Receipts

a. Does the SDA have cash management procedures minimizing the time between the transfer of funds from the Job Training Partnership Office and their disbursements? Identify the time frame involved.

Yes ____ No ____

Comments ____

____

b. Does the SDA have a separate bank account designated for JTPA funds? Provide name of bank and account number.

Yes ____ No ____

Comments ____

____

c. Does the SDA have written acounting procedures that adequately cover:

(1) Recording of receipts immediately upon receipt?
(2) Supervising/observing cash handling procedures?
(3) Providing adequate physical security for cash?

(4) Depositing receipts intact?

(5) Posting records timely from initial receipt records?

(6) Segregating record keeping and cash handling duties?

Yes ____ No ____

Comments ____

____

Cash Disbursements

Review and verify that the SDA has written accounting procedures that adequately cover:

-- Making payments by prenumbered check.

-- Safeguarding blank check supply.

-- Maintaining source documentation for all disbursements.

-- Requiring two signatures on checks.

-- Reconciling bank/trust accounts monthly.

-- Controlling check signing plates.

Comments ____

____

a. Do cash management procedures in effect require the SDA to:

(1) Maintain daily cash control work sheets?

Yes ____ No ____

Comments ____

____

(2) Maintain projected daily cash needs work sheets?

Yes ____ No ____

Comments ______________________________

____

(3) Obtain from the subcontractors projected cash needs?

Yes ____ No ____

Comments ______________________________

____

(4) Review daily cash balances of subcontractors during monitoring visits?

Yes ____ No ____

Comments ______________________________

____

(5) Avoid paying bills earlier than necessary?

Yes ____ No ____

Comments ______________________________

____

Payroll

a. Review and verify that there are written authorizations on file for all employers covering rates of pay, withholdings, and deductions.

Comments ______________________________

____

b. Is distribution of payroll charges based on documentation prepared outside payroll department? If so, by whom?

Yes ____ No ____

Comments ______________________________

____

c. Describe timekeeping procedures, including the use of time clocks or attendance sheets and supervisory review and approval, employed for controlling paid time.

Comments ______________________________

____

d. Are payroll checks prepared and distributed by individuals independent of each other? Please describe system used.

Yes ____ No ____

Comments ______________________________

____

e. Are other key payroll and personnel duties, such as timekeeping, salary authorization, and personnel administration, adequately separated? Attach unit organization chart.

Yes ____ No ____

Comments ______________________________

____

Participant Payroll Procedures

a. Are timecards and attendance records maintained? If so, by whom?

Yes ____ No ____

Comments ____

____

b. Review and verify that daily timecards and/or participant daily attendance sheets are signed and certified by the participant and certified by the instructor and/or supervisor.

Comments ____

____

c. Describe procedure used for distribution of paychecks. Is it followed?

Yes ____ No ____

Comments ____

____

d. Is a participant-roster payroll sign-off sheet maintained? If so, by whom?

e. Describe procedures used for handling unclaimed checks?

Comments ____

____

Purchasing

a. Is the purchasing function separate from accounting and receiving?

Yes _____ No _____

Comments ____

____

b. Does the SDA obtain competitive bids? Describe bid procedures.

Yes _____ No _____

Comments ____

____

c. Describe procedure used by the purchasing agent to obtain additional approval for purchasing above a stated amount?

Comments ____

____

d. What procedures are used to obtain the best possible price for items not subject to competitive bidding requirements, such as approved vendor lists and supply item catalogs?

Comments ____

e. Are prenumbered purchase orders used for all items of cost and expenses?

Yes _____ No _____

Comments ____

____

Receiving and Accounts Payable

a. Does the SDA have a receiving function to handle receipts of all materials and equipment? Briefly describe.

Yes _____ No _____

Comments ______________________________

____

b. Are supplies and equipment inspected and counted before acceptance for use? If so, by whom?

Yes _____ No _____

Comments ______________________________

____

c. Are quantities and descriptions of supplies and equipment checked against purchase orders?

Yes _____ No _____

Comments ______________________________

____

d. Are the individuals responsible for accounts payable other than those responsible for cash receipts or disbursements?

Yes _____ No _____

Comments ______________________________

____

Matching requirements

a. What controls and procedures are in effect to ensure that local education agencies match equally the federal funding of cooperative agreements under JTPA? (Section 123 of Act)

Comments ____

b. What controls and procedures are in effect to ensure that the SDA will expend, for purposes under Title III, an amount from public or private nonfederal sources equal to the JTPA funding?

Comments ____

c. What controls and procedures have been developed to account for matching fund expenditures?

Comments ____

3. Fiscal Reporting System

a. Is there a clear audit trail from the books of account to source documents?

Yes ____ No ____

Comments ____

b. Describe procedures and controls in effect to ensure that reports are submitted by due dates to the State and/or SDA.

Comments ____

c. Does auditee have systems that permit accurate and efficient preparation of:

-- Financial reports?
-- Statistical reports?

Yes ____ No ____

Comments ____

____

d. Are work papers supporting financial and statistical reports to be retained for audit? Where are they maintained, and for how long?

Yes ____ No ____

Comments ____

____

C. Organization

1. Utilization of Program Resources

Staff

a. Is the SDA's staffing level commensurate with the size of the operation? Attach organizational chart with staffing levels.

Yes ____ No ____

Comments ____

____

b. Is each operational system appropriately staffed?

Yes _____ No _____

Comments ____

____

c. Is the support staff sufficient to carry out the clerical-related needs of the SDA? Describe ratio between clerical and professional staff.

Yes _____ No _____

Comments ____

____

d. After reviewing and observing both administrative and operational functions, does there appear to be staffing changes which could be made to utilize personnel more effectively? If so, describe.

Yes _____ No _____

Comments ____

____

Facilities and Equipment

a. Are the facilities and equipment sufficient for the type of training being conducted and the number of individuals participating?

Yes _____ No _____

Comments ____

____

b. Do the SDA's facilities appear to be effective and likely to achieve performance goals?

Yes ____ No ____

Comments ____

____

2. Utilization of Community Resources

a. Are there existing facilities or equipment in the community which could have been utilized in lieu of the SDA's facilities/equipment? If so, explain.

Yes ____ No ____

Comments ____

____

b. Has the SDA given consideration to other agencies or organizations in delivering comparable or related services?

If so, were the following areas considered in the selection of service deliverers:

-- Demonstrated performance in terms of the likelihood of meeting performanmce goals?
-- Cost?
-- Quality of training?
-- Characteristics of participants?

Yes ____ No ____

Comments ____

____

c. Has the SDA considered appropriate education agencies to provide educational services in the area?

If not, did the administrative entity demonstrate that alternative agencies or organizations would be more effective or would have greater potential to enhance the participants' continued occupational career growth?

Yes _____ No _____

Comments ____

____

d. Describe how the SDA obtains information from various agencies' staff/personnel to validate the training and possibly enhance the learning experience for participants?

Comments ____

____

Attachment 2

ASSESSMENT WORKBOOK

I. Introduction

II. Problem Identification Process

III. Areas Which Impact Operational/Program Effectiveness

   A. Elements or Aspects of Training/Services

   B. Participants

   C. Employer Involvement

   D. Coordination/Linkages

   E. Area Characteristics

   F. Program Management

Attachment 2

ASSESSMENT WORKBOOK

I. Introduction

The assessment process provides a method for conducting in-depth reviews of SDA programs. This section should be used when the Field Liaison identifies a potential problem or deficiency which requires further review. The workbook contains the following two sections:

- Problem Identification Process

- Areas which Impact Operational/Program Effectiveness

These sections will assist the Field Liaison to identify and focus on specific areas which require technical assistance and/or corrective action. The assessment process should be used primarily with the Training/Services Programs (Section B-2 in the Guide).

II. Problem Identification Process

A. The Field Liaison should complete Chart A--Performance Indicators--as one of the first steps in the problem identification process. The chart shows the SDA's adjusted performance standards, actual performance to date, and the difference between projected and actual performance.

Factors which may indicate that a problem exists or there is a need for technical assistance include:

- The SDA has made little or no progress in meeting performance standards in two or more consecutive quarters;

- The SDA has not met the same standard in two or more consecutive quarters;

In addition to identifying problem areas, the Field Liaison should consider assisting SDAs meet performance standards in areas which qualify them for incentive funds, i.e., adult entered employment rate, welfare recipient entered employment rate and youth positive termination rate.

Next, the Field Liaison should complete Chart B--Expenditure Worksheet--and the accompanying questions in order to assess the SDA's financial status.

B. The Field Liaison should determine the extent that goals and objectives are being attained. In doing so, the Liaison should compare the SDA's planned goals and objectives with the accomplishments achieved to date. The goals and objectives of the SDA might include benefits and activities other than those associated with the attainment of performance standards prescribed by the Department of Labor or Governor. Examples of local goals and objectives are:

- Coordination of JTPA/FESA and Job Service planning activities to reduce duplication and maximize resource use.

- Development and provision of technical assistance that allows PICs and local elected officials to effectively link economic development and employment and training strategies.

- The involvement of employers in the design and development of programs and services that meet their needs.

- Provision of training resources for eligible persons in demand occupations.

C. The next step for the Field Liaison is to identify the major factors or areas which are most likely to be deficient and adversely affecting program performance. The factors/areas may be one, or a combination of, the following:

- Elements or aspects of training and services;

- Participants;
- Employer involvement;
- Coordination/linkages;
- Area characteristics; and
- Program management.

The factors which appear to affect performance will be identified during the routine program review process (pre-onsite and onsite). A series of questions have been provided in Section III of this workbook to assist the Field Liaison answer the following question:

> "What is happening that should not be happening or what is not happening that should be happening?"

The questions are pertinent to the major factors which may impact program performance. The data sources which may be used to elicit answers to the questions are essentially the same as those listed in Section C (Program Review Process) of the Guide.

D. After analyzing all data, the Field Liaison should determine the potential problem areas and briefly describe the identified relationship between program outcomes and the training/services activities or other influencing factors.

E. Finally, the Field Liaison should recommend actions, including technical assistance, to correct deficiencies which prevented the SDA from meeting performance standards, goals and objectives, and/or needs.

The findings from the assessment process should be documented in a report to SDA and JTPO management.

III. Areas Which Impact Operational/Program Effectiveness

A. Elements of Training/Services

1. The Field Liaison should identify the type of programs being operated by the SDA.

2. In assessing the effectiveness of the SDAs' training programs, the Field Liaison should consider the guidelines in JTPA, Section 141. These include:

   (a) Training provided shall be only for occupations for which there is a demand in the area served or in another area to which the participant is willing to relocate.

   (b) In the selection of training programs, the SDA may give consideration to training in occupations determined to be in sectors of the economy which have a high potential for sustained demand or growth.

   (c) Efforts should be made to develop programs which contribute to occupational development, upward mobility development of new careers, and overcoming sex-sterotyping in occupations traditional for the other sex.

3. In JTPA, section 167 stipulates that participants are not to be employed/trained on the construction, operation, or maintenance of any facility that is used for sectarian instruction.

4. By answering the following questions, the Field Liaison should be able to determine how the elements of the training/services have affected the SDA's operations:

   (a) What training and services activities were provided by the SDA?

(b) What effect did the emphasis within the training and services activities have on the SDA's operation and/or outcomes?

- Sequence of activities

- Emphasis given to various aspects of activities

  o Job behavior versus skills training

  o Work versus training environment

  o Independent versus close guidance

- Method of providing activities

(c) What effect did the following factors contribute to the effectiveness of the training:

- Trainer performance and commitment?

- Trainer qualifications?

- Training facilities?

- Trainer turnover?

- Teaching aids?

- Safety training for work involved?

B. Participants

1. The Field Liaison should identify the participants/substantial segments planned to be served in the Job Training Plan and assess whether the SDA is progressing towards achieving established goals.

-- Consideration should be given to JTPA, Section 167 which states that no individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any program because of race, color, religion, sex, national origin, age, handicap, or political affiliation or belief.

-- In each SDA, the ratio of participants in OJT (under Title II) in the public sector to participants in such training in the private sector should not exceed the ratio between civilian governmental employment and nongovernmental employment in such area.

2. To determine if the SDA was effective in increasing the participants' employability and job placement in the private sector, the following questions should be answered:

(a) What is the target group/substantial segment(s) to be served?

(b) What are the characteristics of the target group?

- Ethnicity
- Sex
- Age
- Education
- Other identifying factors

(c) What are the needs of the target group?

- o Employment:
  - Occupational skills
  - Job behavior skills
  - Job-finding skills
- o Personal development
  - Self-esteem
  - Self-confidence
  - Motivation
- o Continuation/completion of education

(d) Were certain target groups/substantial segments more successful than others?

(e) What activities and/or services were provided to meet the needs of participants?

(f) Did the activities and/or services vary for the successful and unsuccessful participant groups?

(g) To what extent were the needs of the participants met by the training/services programs? What was effective in meeting the needs?

Some indicators that the participants' needs were met are:

Improved work behavior

- Attendance
- Acceptance of supervision
- Working relationships
- Willingness to do work
- Retention by employer

Improved job skills

- Ability to do the job
- Ability to get a job related to training
- Retention by employer

Improved self-image

- Presentation of self
- Confidence in abilities
- Willingness to seek own job

Job-Finding Skills

- Interviewing skills
- Application/resume preparation

- Job-finding resources
- Ability to get a job
- Establishing employment goals
- Understanding employer requirements and expectations

Employment

- Jobs held before and after training
- Jobs obtained which are in the field of training
- Skills gained from training which are transferable to the job obtained.
- Potential for advancement in field/job obtained

Youth Competencies

- Elementary, secondary and post-secondary school completion
- Enrollment in other training programs or apprenticeships
- Enlistment in Armed Forces

h. Did the participants possess any characteristics which had an impact on operations and/or outcomes?

C. Employer Involvement

1. Identify the employers/businesses in the private sector which were utilized by the SDA for training purposes.

2. To assess the impact of employer involvement, answer the following questions:

   (a) What kinds of businesses participated? (Type of industry)

   (b) What was their involvement?

   Areas may include:

   - Concept design
   - Planning
   - Operations, including provision of training, supervision, facilities for training
   - Providing or developing employment opportunities

   (c) What was the attitude of employers toward the training program(s)?

   (d) To what extent did the employer/private sector involvement assist in producing the desired outcomes? Why or why not?

   Consider the following:

   - Participant needs met
   - Quality of training
   - Quality of job placements
     - Net increase in wages
     - Jobs in field of training

- Community benefit

(e) When was employer involvement most effective?

- What stage(s) of program?
- Under what training circumstances?

Consideration should be given to:

- Skills training
- Job behavior training
- Job development

(f) What influenced the employers to become involved?

(g) What impact did program have on employers? Was the program what they expected? If not, why?

D. Coordination/Linkages

1. The Field Liaison should define the coordination/linkages established by the SDA.

2. To determine the extent the integration of services within the SDA affected the training program, the following questions should be answered:

   (a) What coordination/linkages were established?

   - Who were the parties involved in coordination?

- Why did the various parties become involved? What were their needs?
  - Reduced cost
  - Increased effectiveness
  - Increased community support
  - Increased job opportunities
- What functions were parties to perform?
- At what organizational level did coordination/linkages occur?
  - Administrative
  - Managerial
  - Line staff
- How did the geographic location of the coordination/linkages affect coordination?
- What commitment was made by each agency to ensure positive outcomes?
- What other factors influenced establishment of coordination/linkages?
- How did establishing coordination/linkages affect outcomes?
  - Goal attainment?

- Employment opportunities for participants?

- What was critical to the establishment of effective coordination/linkages?

(b) Were there potential areas of coordination which could have assisted that were not pursued? Why?

(c) In what ways were coordination/linkages of services improved?

- What was in existence before improvements?
  - What agencies were involved?
  - What was their level of involvement?
- What did parties believe was in need of improvement?
- How were needs identified?
- What was done to make needed improvements?
- Were improvements made? If so, what were the results? If not, why?
- What was effective or instrumental in making improvements?

(d) To what extent was duplication of services reduced?

(e) Were there cost savings by reducing duplication? If so, in what areas and how much?

- Less overhead costs
- Less staff costs

(f) To what extent did reducing duplication aid participants?

- Faster services

- More comprehensive services

- Served client needs better

(g) What were the barriers to coordination?

(h) To what extent were methods used to eliminate the barriers effective?

(i) What coordination/linkages appear to be worthy of replication? Why? Under what circumstances?

E. Area Characteristics

In order to determine and assess the area characteristics which affected the SDA's program performance, the Field Liaison should consider the following:

1. Economic conditions of the SDA

2. Type of industry in which training is concentrated

   - Hiring patterns

   - Growth of industry

   - Decline of industry

   - Available job openings

   - Skill levels required for employment in the major industries

3. Access to training, services, jobs

    - Transportation

    - Jurisdiction of service providers

    - Structural barriers (accessibility for disabled)

    - Adequate training facilities

4. Stability of population

    - Migrant/seasonal workers

    - Youth

    - Influx of job seekers

F. Program Management

The extent to which the program management affected the SDA's operations may be assessed by answering the following questions:

1. To what extent did the program management use a needs assessment in the development of goals and objectives?

2. To what extent did program management select training concepts capable of fulfilling identified participant needs?

3. To what extent did the assigning of priorities to the identified needs assist in setting goals and objectives?

4. To what extent did management's control over resources affect the operations or outcomes?

   - Staff

   - Time frames

   - Funds

   - Facilities and equipment

   - Job openings

5. To what extent did management's coordination with other agencies contribute to the operations/outcomes of the program?

6. To what extent did management control techniques affect operations outcomes?

   - Scheduling, priority setting

   - Motivation

   - Communication

   - Staff utilization, assignment

   What management techniques were used?

7. To what extent did management's activities affect the community's perception of the program?

8. What activities were most beneficial in securing community support?

CHART A

Performance Standards

Deviations from performance standards may be indications that further review is necessary. In order to determine this complete the following chart:

	Approved Standard		Actual		Difference	
	Number	%	Number	%	Number	%
	A	B	C	D	E	F
o Entered Employment Rate						
o Cost per Entered Employment						
o Average Wage at Placement						
o Welfare Entered Employment Rate						
o Youth Entered Employment Rate						
o Youth Positive Termination Rate						
o Cost per Positive Termination						

In columns A and B, enter the projected performance to date from the SDA plan.

In columns C and D enter actual performance to date from MIS.

In columns E and F show difference between projected performance and actual performance.

Indicate goals and objectives from the plan which are not being met.

Goal	Objective	Comment

CHART B

EXPENDITURE WORKSHEET

Title	Total Allocation	Training Actual-to-Date		Administration Actual-to-Date		Participant Support Actual-to-Date	
		$	%	$	%	$	%

After the expenditure worksheet has been completed, the following questions should be answered, which will assist the Field Liaison to analyze expenditures in view of JTPA, Section 108:

1. Has more than 15 percent of the funds available to the SDA been expended on administration?

   Yes ____ No ____

   If the SDA has exceeded the limitation, why has this occurred?

2. Has more than 30 percent of the funds available to the SDA been expended for administrative costs and the costs specified below:

   (i) 50 percent of any work experience expenditures which meets the requirements specified in Section 108(b)(3);

   (ii) 100 percent of the cost of any work experience program expenditures which do not meet requirements in Section 108(b)(3);

   (iii) supportive services; and

   (iv) needs-based projects described in Section [204(27)]?

   Yes ____ No ____

   If the SDA has exceeded the limitation, why has this occurred?

3. Has the SDA, through the PIC, initiated a request to exceed the 30% limitation?

   Yes ____ No ____

4. Has the SDA stated the need for and the amount of excess in the job training plans?

Yes ____ No ____

5. Has the SDA explained that the excess costs are due to one of the following conditions:

- o The unemployment rate in the SDA exceeds the national average unemployment rate by at least 3 percentage points, and the ratio of current private unemployment to population in such area is less than the national average of such ratio?
- o The job training plan for such area proposes to serve a disproportionately high number of participants from groups requiring exceptional supportive services costs, such as handicapped individuals, offenders, and single heads of households with dependent children?
- o The cost of providing necessary child care exceeds half the costs specified in Section 108(b)(2)?
- o The costs of providing necessary transportation exceeds one-third of the costs specified in Section 108(b)(2)?
- o A substantial portion of the participants in programs in the SDA are in training programs of 9 months' duration or more?

Yes ____ No ____

Comments ____

6. Has the SDA demonstrated that the supportive services described in the job training plan do not duplicate services provided by any other public or private source that are available to participants without cost?

Yes ____ No ____

Comments ____

ATTACHMENT 3

PROGRAM OPERATOR/PROGRAM STAFF/PIC REPRESENTATIVE QUESTIONNAIRE

1. What are the needs of the Service Delivery Area?

Promptors:
- o Participant needs (e.g., specific job skills, basic education, supportive services, etc.)
- o Employer needs (e.g., trained labor pool, reimbursement for training, etc.)
- o Community needs (e.g., economic development, public works, etc.)

2. How were the needs determined?

Promptors: Formal needs assessment, common knowledge, community-based organizations, local or federal government reports, business groups, etc.

3. Which needs are the SDA's program trying to meet? Why?

Promptors: Reduce adult/youth unemployment, encourage business expansion, supplement available training programs, reduce demands on limited public resources, etc.

4. What was provided to meet the needs?

Promptors: Specific job skills, job seeking skills, job behavior skills, basic education, child care, training-related expenses (tools, clothes, etc.), transportation, personal and employment counseling, etc.

5. To what extent are the program activities meeting the needs? How do we know?

Promptors: Training-related employment, employer satisfaction, reduced duplication of public services, retention in employment, increase in earnings, return or continue school, reduced welfare payments, increased employment among groups with severe barriers to employment, etc.

6. What needs were not met? What was the affect of those unmet needs on program outcomes?

Promptors: Employment and training needs of the potentially eligible population, needs of employers, needs of the community, recruitment, assessment, orientation, training, job services, supportive services, placement.

7. How were other agencies involved? What was the affect on program operations and outcomes?

Promptors: More comprehensive services, reduced duplication of effort, maximized resources, etc.

8. Were there any barriers to coordination/linkage? If so, how were they resolved?

Promptors: "Turf" issues, unclear roles and responsibilities, lack of formal interagency agreements, etc.

9. What was the involvement of the private sector? What effect did their involvement have on program operations/outcomes?

Promptors: Training employers, advisory committees, provider of facilities, etc.

10. What did you do to encourage the cooperation of employers?

Promptors: Wage subsidies, tax credits, surveyed employer needs, stressed public relations benefits, solicit employers for an advisory role, etc.

11. Were there other factors which affected the outcomes? What was the impact?

Promptors: Economic conditions, geographic location, specific participant traits, etc.

12. What management practices and controls have you implemented to ensure attainment of performance standards, goals, and objectives? To what extent are they effective?

Promptors: Internal monitoring, corrective action procedures, fiscal controls, self-evaluation utilization of community resources, reporting systems, use of available MIS data, technical assistance to subordinate organization.

13. What can be done to make the program more effective?

Promptors: Improved communications, employer involvement, coordination, training methods; appropriateness of training, staff, facilities, management practices and controls.

EMPLOYER AND OTHER AGENCY STAFF QUESTIONNAIRE

1. What was your involvement in the program?

   Promptors:
   - o Employers--Trainer, consultant, hiring employer, etc.
   - o Agencies--Service provider, planning, administrative role, etc.

2. Why did you become involved?

   Promptors: Wage subsidies, tax credits, public relations, etc.

3. How has your involvement helped the program?

4. Did the program meet your expectations? If not, why?

   Promptors:
   - o Employers--trained employees, labor pool, subsidized training, etc.
   - o Agencies--Improved services to clients, additional resources, etc.

5. Did you experience any problems with the program? Were there any problems in coordinating your involvement with the program?

   Promptors: Lack of communication, lack of clear roles and responsibilities, unrealistic expectations, coordination problems, problems with participants, problems with program staff, lack of resources or facilities.

6. What do you see as the program management's strengths and/or weaknesses in planning, implementation, and the continuing operation?

   Promptors: Communications, coordination, training methods, appropriateness of training, transportation, staff facilities, management practices and controls.

7. How can this program be improved?

PARTICIPANT QUESTIONNAIRE

1. How did you find out about the program?

   Promptors: Friends, family, newspapers, TV, etc.

2. Why did you enroll in the project?

   Promptors: Job skills, employment, retraining, etc.

3. What did the program provide for you?

   Promptors: Recruitment, assessment orientation, training, services, etc.

4. How has the program helped you? Did it provide what you expected? (Note: See interviewers response to question #2.)

Promptors: Self-confidence, transfer to another training program, joined armed forces, return to school, employment, increased employability, increased wages

5. Did you have other needs that the program did not meet? How did this affect your participation in the program?

Promptors: Child care, clothing, equipment, bilingual abilities, wages, stipends, etc.

6. What could be done to improve the program?

Promptors: Management practices, training methods, employer commitment, supportive services, identification of individual needs, training types and methods, adequacy of supportive services, facilities and equipment, staff, management practices, and controls.

7. Did you receive public support payments immediately preceeding or during the program? Has the amount changed because of your participation in the program? By how much?

Promptors: General assistance, AFDC, food stamps, SSI, UI, etc.

TERMINEE FOLLOW-UP QUESTIONNAIRE

Questions to be asked to participant 13 weeks after termination from a program.

1. Did you have employment in the 13 weeks prior to your participation in the program?

2. How many weeks were you employed during that period of time?

3. How many hours a week did you work on the last job during that period.

4. What was your average hourly rate of pay in the last job you held during that period?

5. What type of work were you employed to do?

6. Were you employed in the 13 weeks after your participation in the program? Ask questions 2, 3, 4, and 5 for the13-week post-termination period.

7. Were you or your family receiving cash welfare or other form of public assistance when you enrolled in the project? What kinds of assistance? How much were you receiving each month? How long have you been receiving this support? Why did you need this assistance?

8. Were you receiving cash welfare at the time you left the program? Was it more, same or less than the amount you were receiving at enrollment in this program?

9. Was the amount of that grant reduced since you left the program?

10. How much was the reduction?

11. Why was it reduced?

12. How well did the program prepare you for employment?

13. What was the most important activity?

ATTACHMENT 4
22:008:emp

REPORT FORMAT

- **Background Information**

Background includes information on who conducted the review, the name of the SDA or subrecipient under study, the dates of review, key personnel contacted and the type of study conducted.

- **Purpose of the Visit**

A clear statement of the purpose of the onsite visit should be made early in the report. By establishing a specific purpose, you allow the person receiving your report to have a clear idea of the "why" behind your review and/or assistance.

- **Summary of Findings**

A brief statement outlining the major findings should be included in this section.

- **Findings**

The body of the report should spell out the findings of the review. You should deal with both the positive and negative aspects if possible, and relate any followup of previous visits that has been completed. Deal in specifics, i.e., in relation to the law, guidelines, regulations or contractual agreements. Personal conjectures should be avoided. Cite the specifics of your findings.

- **Recommendations**

The recommendations include any actions required to improve program performance, including technical assistance.

Within this section, the technical assistance provided and/or recommended should be discussed.

Corrective action plans should be discussed in detail by outlining the specific steps to be taken to correct deficiencies or improve performance. Every report should include the date on which the SDA or subcontractor should complete the corrective action.

o **Follow-up**

The report should outline the steps to be taken by the Field Liaison to:

1. Verify technical assistnace.
2. Determine extent of corrective action taken and its impact.

The follow-up plan should also include time frames when these actions will occur.

o **Conclusion**

The report should conclude with the name and telephone number of the person responsible for the program within your organization.

If the reports are sent to the SDAs and/or subcontractors, you might suggest the SDA/subcontractor contact you to ensure no confusion exists over the items cited.

LACW 632 NORTH BRITTANIA STREET
LOS ANGELES, CALIFORNIA 90033

February 13, 1984

I work in downtown Los Angeles, in the heart of the Skid Row District. I work in a free legal clinic which serves the poor of that area.

One of the most common problems we have seen in the recent past is the wholesale eviction of hundreds (probably thousands) of the most impoverished in our city due to nonpayment of rent. The reason for the nonpayment of rent is that the Department of Community Services (DCS), administering the Job Training Partnership Act for the County of Los Angeles, has failed to make timely payments, and the DCS knew full well that there were going to be and actually were, mass evictions because they knew they were not generating checks within the period of time allowed.

But the failure of the DCS to issue timely payments is just the tip of the iceburg. We have seen...

-total confusion and ignorance on the part of the DCS;
-rental increased due to bimonthly checks as opposed to monthly checks;
-participants denied medical care because nobody at the DCS knew how they were suppose to prove their eligibility for medical services;
-claimants shuffled from office to office;
-angry DCS workers frightened to speak out about the problems;
-claimants kept in total darkness about their future and whether or not they would still be eligible for the meager payments after a few months;
-General Relief recipients manning the information phones at the DCS and giving out erroneous information;
-claimants given phone numbers to call in case of a problem, phones that stay busy from morning to night.

A typical case is one of a developmentally disabled man who was rejected by the service provider, he did not get a DCS check and would have been evicted had we not interceded on his behalf. This man was not a welfare cheat or too lazy to work. He had always repaid the County of Los Angeles for his grant by working at minimum wage on a work project, as have all other recipients who were not disabled. This man should not have been treated like an animal!

Enclosed are samplings of the cases we have seen. I hope they provide an insight into the travesty perpetrated on the most helpless and disenfranchised in our society.

Sincerely

Matthew Lyons

NAME: EAS ON N.

SUMMARY:

Mr. N. had received a smaller than usual General Relief check for the month of September. Even though he was transferred to the D.C.S., his checks continued to be short. His G.R. grant was suppose to be $248.00 per month and the DCS grant $223.00. Because Mr. N. pays $190.00 per month rent, typical of Skid Row, he had to borrow money to pay his rent or face eviction for nonpayment. He was able to borrow the money for September and October but not November.

I contacted both the G. R. office and the D.C.S., an agreement was worked out for Mr. N. to pick up his check.

MATTHEW LYONS

NAME: DONALD M.
MARY S.

SUMMARY:

They came to Los Angeles on a Friday afternoon. It was too late in the day to get emergency aid from the General Relief (G.R.) office. Because there are no missions in the Los Angeles area for women, they slept on the streets for three nights. The following Monday they were given housing vouchers by the G.R. office.

They received a voucher to cover their housing for seven days past the date of their Department of Community Services (D.C.S.) interview. At their D.C S. interview they were told they would not receive a check for seven to 10 days. They were evicted from their housing for nonpayment of rent before the D.C.S. checks came.

After sleeping a night in a parking lot, they came to the INNER CITY LAW CENTER (ICLC). I used an inside line which the ICLC had aquired to make contact with a DCS officer. I was told that:

1) he had 3 people in his office in exactly the same situation;
2) this is a consistent problem, that the DCS is seeing 150 to 200 people a day with the same problem;
3) the DCS expected and planned to process 9,000 to 10,000 people but is processing 18,000;
4) the DCS is not able to generate and mail a check in the seven day deadline inorder to prevent evictions;
5) Mr. M and Ms. S. can not be helped today and will have to spend atleast one more night on the street because the DCS is over taxed at this point.

Mr. M. and Ms. S left the ICLC to find some food and a safe place to spend the night.

MATTHEW LYONS

NAME: GARLAND B.

SUMMARY:

The Department of Community Services (DCS) check did not come by November 5th as it was suppose to. Therefore Mr. B. was evicted from his housing for nonpayment of rent. Mr. B. came to the Inner City Law Center (ICLC). I phoned the DCS on Mr. B's behalf, using an inside line the ICLC had aquired. I was told Mr. B. could come to the DCS office the next morning and a voucher would be waiting for him but that there was nothing the DCS could do for him that night. Someone at the ICLC gave Mr. B. some money for a room for the night.

The next morning Mr. B. was at the DCS office before it opened. But after waiting until after noon, Mr. B. phoned the ICLC to say that he had yet to be seen. I phoned the DCS and was told that a voucher was on its way down and that Mr. B. would have it in just a couple of minutes.

MATTHEW LYONS

NAME: MEREJILDO F

SUMMARY:

Mr. F was transferred from General Relief (GR) to the Department of Community Services (DCS). GR provided his housing for 7 days past the date of his DCS interview of November 4, 1983. At the DCS interview he was told that he would not recieve a check for 12 to 14 days. The interviewer would not address the issue of his rent for the period between the end of the GR payment and the begining of the DCS payment.

Mr. F came to our office on November 8, 1983. Using an inside line the Inner City Law Center had aquired, I was able to secure emergency money from the DCS for Mr. F. before his rent expired.

MATTHEW LYONS

NAME: ROBERT P

SUMMARY:

Mr. P missed an appointment with his General Relief worker to get a refurral for the Department of Community Services (DCS). He was terminated and given a 60 day penalty.

Mr. P has been on disability because of a psychological impairment. His history and disability were not taken into consideration when he was terminated and given the 60 day penalty.

I refurred him to the Los Angeles County Mental Health office where he could get an exame and possibly receive a waiver of the penalty.

MATTHEW LYONS

NAME: CHRISTOPHER B.

SUMMARY:

Mr. B had been transferred from the General Relief to the Department of Community Services program. He came into the Inner City Law Center because he was unable to complete the forms by himself and requested assistance. I helped him fill out the forms.

MATTHEW LYONS

NAME: DAVID W.

SUMMARY:

Mr. W. had been transferred to the new Department of Community Services (DCS) program. He was given a voucher for a room by the General Relief office which lasted 7 days past the date of the DCS interview. Mr. W. went to the November 7, 1983 interview with the DCS. The DCS worker told Mr. W. that a check would not come for 7 to 10 days and the worker wrote on Mr. W.'s refurral that Mr. W. would be "homeless in 7 days". Both the worker and Mr. W. knew that the odds were that Mr. W. would be evicted from his residence for nonpayment of rent.

Mr. W. came to the Inner City Law Center (ICLC) on November 22, 1983, the 8 th day of being homeless. Using an inside line to the DCS the ICLC had aquired, we were able to aquire a housing voucher for Mr. W. that day.

MATTHEW LYONS

NAME: JOHNNY MC C.

SUMMARY:

Mr. McC. had gone to the Department of Community Services (DCS) provider to pick up his check as instructed to do. The DCS provider told him that he was not qualified for that training program so they sent his check back to the DCS.

On December 5, 1983, Mr. McC waited 5 hours at the DCS office located at Patriotic Hall. He was told that his check had not arrived and would not come until December 9th. Mr. McC explained that his eviction from his residence of two years was imminent and that he would be on the street before December 9th. He was told to go to the DCS office in the Indo-Chinese Center on Spring Street where he could pick up a voucher for a room.

Mr. McC. went directly to the Indo-Chinese Center. After waiting without being seen until closing time, he was told to return in the morning . The next morning he was back at the Center. He was seen and told that they did not know where his check was but that he should go back to the Patriotic Hall on the 9th. He was told that he could not get a housing voucher.

Mr. McC. then went to his General Relief office. He was told that the only help they could office him was to give him a list of three phone numbers to the DCS.

Mr. McC had absolutely no money, not even one dime for a phone call, so he came to the Inner City Law Center (ICLC) and asked to use our phone.

I tryed to get through to the DCS using the phone numbers the GR office had given him. After over a half hour of just busy signals on the phone, I used one of the DCS phone numbers that the ICLC had aquired. Two Hours later I was told that Mr. McC's check was at the Patriotic Hall. I gave Mr. McC the name and phone number of the DCS contact and the number of his check, we gave him our phone number and a bus ticket.

MATTHEW LYONS

NAME: JOHNNIE T

SUMMARY:

Mr. T received a "NOTICE OF DENIAL" from the General Relief office and asked me to explain why he could nolonger receive aid. He came into the Inner City Law Center on Dec. 6. The "NOTICE" was a simple form letter sent to all the GR recipients transferred to the new Department of Community Services program informing them of the change. Mr. T can not read or write so well and only understood the letter after I explained it.

MATTHEW LYONS

NAME: RICHARD D.

AGE: 48

SUMMARY:

Mr. D. applied for General Relief ("GR") on October 3, 1983. He was given vouchers for a Skid Row hotel, the vouchers covered his rent up to and including the 18th of October. An appointment was made for him to see a Department of Community Services ("DCS") representative on October 13, 1983. It is the job of the DCS to train Mr. D. and help him find employment. If Mr. D. failed to keep this appointment, he would have been terminated from welfare for a period of sixty (60) days.

Mr. D. made the October 13, 1983 appointment. He completed all the paperwork required of him. One of the forms he was given stated that he was to receive a check in the mail within a week.

When Mr. D. first applied for GR, he was asked if he could work. "Of course," he replied. That is why he was referred to the DCS. But at the DCS he was asked if he could do heavy labor, such as digging ditches. This time his reply was, "no". Although he can perform a wide variety of tasks, he is, nonetheless, physically limited due to an injury. The DCS worker told him to go back to the GR office and get a medical card which would allow him to be examined by a physician at a Los Angeles County medical facility, verifying his exertional limitation. Mr. D. went to the GR office and asked his worker if he could have a medical card and also a clothing voucher, as Mr. D.'s only clothes are those on his back. His GR worker told him that his case is out of her hands; and, if he should bother her again, she will see to it that he is removed from the program and given a 60-day penalty.

Mr. D. first came to the Inner City Law Center ("ICLC") on the morning of the 18th. He knew that the landlord of the hotel would evict him if he were to fall behind on his rent. We called the DCS office. We were told that there was nothing they could do about preventing the eviction, and that a check would probably come in two to five days.

Next, we telephoned the office of the Deputy Director for GR. His office told us they are budgeted to finance housing for people up to the 6th day past the DCS interview, no more. We were told their office is flooded with calls from other clients in the same situation as Mr. D. We asked what steps Mr. D. should take in order to acquire a medical card enabling him to get the medical examination he needed. The first answer was that DCS would take care of it. When we explained that DCS sent us to them, we were asked to let them get back to us with an answer. Later, the GR office telephoned back to say the stub from the DCS check would be accepted in any of the county medical facilities as proof of eligibility for care.

Because GR could not help, we telephoned some more DCS offices. It is our understanding that Mr. Terry is the assistant director at DCS. We telephoned his office and were transferred to a man "in charge of housing". That man said that the only reason people were being referred to him was because there are so many problems. He said there is nothing he or DCS can do, that Mr. D. should try to get a place in a mission until his check came. I explained that, once he leaves the hotel, the owner will not give any mail to him sent by the county. That would only mean further delays for Mr. D. In the mail, along with a check, Mr. D. is supposed to receive an appointment to see another DCS representative. Therefore, a likely repercussion of not receiving his mail is that he will miss that appointment and will get a 60-day penalty. Our office has been told that there will be no appeals for any terminations from the program.

At this point, we telephoned the Los Angeles County Board of Supervisor Hahn's office. We were told somebody from the DCS would contact us. I left the ICLC at 6:00 p.m. without hearing anymore from the DCS.

I telephoned the supervisor's office back. A short time later, the DCS telephoned. They could not find Mr. D. on the computer. There was no reason to think that a check would be coming to Mr. D. in the near future. The representative from DCS tried to locate the check, but to no avail.

He was concerned that Mr. D. may have never come to the DCS. I assured him that Mr. D had a number of forms which showed he had been to the DCS at his appointed time, October 13, 1983. The DCS representative suggested that Mr. D. try to find a place to stay the night. He asked Mr. D. to come to his office the next morning, that he would try to find out what the problem was and get Mr. D.'s check for him.

Again, we found a place for Mr. D. But the next morning after visiting the DCS office, Mr. D. came to our office to say the DCS worker said that she could not find his check, although she spent about two hours looking for it. He was stuck again, told to find a place to spend the night and return in the morning. I telephoned the DCS, tried to get some action, could not reach anybody until approximately 4:30 p.m. I was told that if Mr. D. went to the DCS office the next morning, a check would be waiting for him.

For the third night, Mr. D. found a place to stay. The morning of the fourth day, he went to the DCS and, indeed, did receive a check.

Dated: Oct 26-83

MATTHEW LYONS

Since the date of the above declaration, 10-26-83, Mr. D's was evicted onto the streets of Skid Row at least three more times. One of those times, two people tried to rob him and beat him up. In the melee Mr. D killed one of the robbers. The police arrested him, put him in a jail cell full of members of the ethnic group of which the dead man belonged, and let the other cell mate know what happened. Mr. D was severely beaten. A public defender got Mr. D out of jail and the murder charges dropped before going to Court.

The last time I saw Mr. D he was unrecognizable as the person I met when he first entered our office, less than four months ago. The reason he was in our office was because his check was late and he was facing eviction. We could not find the check, which eventually arrived in the mail approximately one week later.

Mr. D has not come by to claim it. We do not know where Mr. D is. He could be anywhere, on the street, in jail, or in the morgue, but he is not in a hotel room.

Matthew Lyons

2-10-84

NAME: J. SMITH

AGE: 28

SUMMARY:

Mr. Smith signed up for Food Stamps in late June of 1983. He did not get the Food Stamps in July, in August, in September or October. When the August Food Stamps did not come, Mr. Smith went to the welfare office and signed an affidavit swearing that he never received them. He was issued Food Stamps on the spot.

When the September Food Stamps did not come, he went to the welfare office, reported the missing stamps and was told that he could only sign one affidavit for missing stamps per sixth month period.

When the October Food Stamps did not arrive, he went to the welfare office. He reported the stamps missing on 10/07/83. His worker told him that he has to wait until 10/11/83 before he could sign an affidavit of non-receipt and get new Food Stamps issued. On 10/11/83, his worker told him to go back home to be sure that the stamps did not come in the mail. They had not. Mr. Smith returned to the welfare office. This time his worker said that he could not sign for missing checks but once every sixth months and " . . . get out of my face." Mr. Smith requested to see the supervisor. He was not seen until the end of the day.

The supervisor told him that new stamps could be issued; that a note would be given to the worker to issue them first thing the next morning--10/12/83.

On the morning of 10/12/83, Mr. Smith went to see his worker again. And again, his worker told him he could not sign the affidavit for new stamps; the worker was aware of the note from the supervisor.

Mr. Smith came next to the Inner City Law Center. We called a local hot-line number (572-5851). I explained the problem to the Recipient Complaint (RC) worker. I quoted the Food Stamp Regulation which states that two affidavits can be signed in six-month period for Food Stamps which had never come in the mail. The RC worker took the information, contacted the welfare office and told them to allow Mr. Smith to sign an affidavit and to issue him stamps on the spot.

We suspect that his Food Stamps will not arrive next month. At that time, he will not be eligible to sign any more affidavits. We are in the process of applying for a hearing, but that usually takes a while. Mr. Smith is on the new welfare program. He receives two checks per month, each for $ 114.00. His rent is $ 175.00 per month for a Skid Row hotel room. That leaves him with an average of $ 1.30 per day with which to eat, wash himself and his clothes, buy aspirin, socks, toiletries, underwear, haircut, telephone calls, bus fare, etc.

Matthew Lyons
MATTHEW LYONS

THOMAS H.

I, Judith Brown of the Inner City Law Center wish to register a complaint on behalf of Thomas H. Mr. H. has not received a GR check since August 5. He has also received no information regarding the new JPTA program and what is expected of him as a participant in this program. On numerous occasions he has visited or telephoned his worker in an attempt to secure his check and on September 13 signed an affidavit in order to have his September check re-issued. On September 29, Mr. H. was forced to leave his residence at 224 East Boyd Street because he was unable to make rent payments. Although the manager of the hotel agreed to hold Mr. H. mail, he has yet to receive any correspondence from GR, except for a medical card.

Mr. H. case is is not at all unique. As an intake worker at the Inner City Law Center, I see perhaps a dozen similar cases every week. Workers are nearly impossible to contact, granted they are overburdened, but is that an excuse for subjecting people to being homeless? After I interviewed Mr. H., I spent perhaps two hours making calls to various persons at DPSS. I called the worker, supervisor, and Deputy Director at DPSS and was unable to make meaningful contact with any of them. As a last resort, I called Kenneth Hahn's office and spoke with an investigative officer who was able to locate the error and enable Mr. H. to secure his check.

Judith Brown
JUDITH BROWN

I, Jackie Basulto, was transferred to the JTPA program from General Relief. I went to me JTPA interview on 11-29-83 as instructed. The worker wrote on my General Relief Referral Notice that I would be homeless after 12-6-83 and told me that I would get a check in the mail before I was evicted for non-payment of rent.

But I did not get a check before then and was therefore evicted. I hoped that the check would go to the old residence even though I was no longer a tenant so I waited until December 12 to go to the DCS to inquire on the where-abouts of my check. I was told that I should come back in two days and they may have my check. But when I returned to the 524 North Spring Street address on the 14th of December, I was told that the check was not there and I should wait 14 more working days, or until January 5th, 1984.

I went instead to the INNER CITY LAW CENTER and after the counsler made some phone calls, I was able to get a check that afternoon, December 15th.

Jackie Basulto

Date: 12-15-83

Social Security #: 566-74-3778

I, WILLIAM HILL , declare as follows:

1. My name is William Hill . I live at the Ford Hotel at 1002 East 7th Street, Los Angeles, California, 90021.

1. During the month of September, 1983, I was transferred from the Department of Social Services General Relief (GR) program to the Job Training Partership Act (JTPA) program.

2. I get two checks a month from JTPA. One for 137.00 and the other for 114.00.

3. The rent for my hotel room is 133.83 monthly.

4. From September, 1983 to January, 1984, my hotel manager let me pay my rent in two payments.

5. In January, 1984, my hotel manager told me that I would no longer be able to pay my rent in two payments because he had had problems with another tennant. Now he wants me to pay all of my rent in the beginning of the month.

6. If I do not pay my rent on a monthly basis, the manager will let me pay on a weekly basis. Paying on a weekly basis will raise my rent fee by 11.00.

7. I can pay my entire rent fee at the beginning of the month, but that means that I will have no money until my next check arrives.

8. I know that 11.00 more per month doesn't sound like much, but when my only income is 251.00 monthly and 133.83 of that is for my rent--11.00 more for rents is a whole lot.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was made this nineteenth day of January, 1984, at Los Angeles, California.

Mr. William Hill

WILLIAM HILL

JOE G.

This 54 year old man was evicted from his room for non-payment of rent because his DCS check did not arrive on time. He lived on the streets of Skid Row from mid October to late November.

Byron D.

Mr. D. is on the DCS program but has not been notified as to whether or not he must do the job search and work project (everybody who is on General Relief and does not have a doctors verification that they can not work, must pay the County back for their aid by working at minimum wage on a County work project).

Mr. D., fearful of being terminated and given a 60 day penalty for failiure to do the job search and work project, came into our office to see if we could help him find out.

I called an officer of the DCS. The person who answered the phone identified himself as a General Relief recipient. He said the phones were "ringing off the hook" but that he will let them ring until he can answer our questions. When the man returned to the phone all he could tell us to do was to go to the DCS office and demand to know whether or not Mr. D has to do the job search and work project.

Matthew Lyons

MATTHEW LYONS

JACKIE B.

At DCS interview the DCS counselor wrote on his paperwork that he would be homeless on December 6, 1983, if his check did not come on time. It did not -- and he was.

ROY B.

Young man of 27, can neither read nor write. I explained his DPSS application and filled it out for him.

JONNIE T.

Can neither read nor write. Was concerned about the General Relief notice of denial he had received. I explained that he was merely being transferred to the new job training program from the General Relief program.

Matthew Lyons
MATTHEW LYONS

On December 15, 1983 I went to a Department of Communitee Services office which issues checks to participants of the SCREP and JTPA programs. I spoke with all the counselors present. They each expressed anger over the fact that they were forced to work under the prevailing conditions. Those conditions landed them in a position where their physical security was jeopardized. One of their coworkers had been beat up by disgruntaled claimants while walking to his car after work. The workers claimed their lives were constantly threatened.

These workers said that some of the anger expressed by the claimants was a result of their being told at the DPSS that they must go to the DCS, but when they get to the DCS they are told they must go to the DPSS. Meanwhile the client does not get a check, gets evicted for non-payment of rent, and nolonger has an address where the checks, food stamps and medical cards can be mailed to.

None of the DCS counselors would reveal their names. Each expressed fear of retaliation from the DCS if they were to speak out. They refurred to their office as "the War Zone".

Matthew Lyons

MATTHEW LYONS

On december 21, 1983, we received a call from a very angry social worker employed by the County of Los Angeles. He had three people in his office who were transfered from the Department of Public Social Services to the Department of Communittee Services but missed their interviews and were given 60 day penalties (which means they cannot receive any form of welfare for those 60 days). Their penalties had expired but the DPSS told them that before they can reapply for General Relief they must get a form from the DCS. But try as he might, the social worker could not find anybody at the DPSS or the DCS who know where to get the forms.

The social worker requested anonymity.

MATTHEW LYONS

DECLARATION

I, MARTIN WALLEY, declare as follows:

1. My name is Martin Walley. I reside at the Pennsylvania Hotel at 456½ South Main Street, Los Angeles, California.

2. I am currently enrolled in the Job Training Partnership Act (JTPA) program administered by the Department of Community Services (DCS). I was switched to the JTPA program from General Relief in October of this year. The JTPA program is the new program which all employable General Relief recipients were offered at the time when our General Relief was cancelled last September and October. Supposedly the new program would train us for a job and then help us to begin working. I was happy when I learned that I would be put in the JTPA program, because I really want to work. I am a healthy young married man, and I need to learn a skill so I can go to work. I would especially like to be trained in arc welding.

3. It is now mid-December, and I have not been placed in any job training program. All I do under the JTPA program is what I did before under General Relief. I go to twenty possible employers a month and have them sign a form that says I came looking for a job. I say "possible employers" because that is what the County says to us. In fact, if any of those were really possible, I'd be working now.

///

///

///

///

4. But even though I do what I am supposed to, the DCS has not done what they are supposed to do. In the beginning of December I went to pick up my check at the Indo-Chinese Center where they hand them out, and there was no check. I was told that I had been terminated from the program. I asked for a reason, and no one could give me one. But I did not get my check. I sought free legal help, and a lawyer was able to help me get my check. It was a week late, and no reason was ever given. As a result, I could not pay my rent at the hotel my wife and I had been living at, and we had to move to a dingy skid row hotel for a week, until we thought our next check would arrive and we could move back.

5. Now I have been informed that my next check will not be issued until Monday, December 19 -- four days late. I do not know why. But now I cannot even pay rent for the skid row hotel we are staying in now. The rent is up Saturday, December 17. Knowing this, I went back to the Inner City Law Center, where I had gotten help with JTPA before. An intake worker there called a Mr. Thomas, who is supposed to help people who are about to be evicted because of DCS mistakes. She explained the whole situation to Mr. Thomas. He told her on the telephone that I could go that morning to the Indo-Chinese Center and ask for a voucher for the weekend until my check came. The intake worker explained to him that the hotel I am staying in does not take vouchers. He said that was fine. In that situation, the DCS gives out something else like a voucher that a hotel will take.

///

///

6. I walked over to the Center with a letter that the intake worker had written, repeating what Mr. Thomas had told her on the telephone. When I got there and asked for a voucher, the worker laughed in my face. I showed her the letter, and she said it did not make any difference. She had never even heard of Mr. Thomas. And even if she had, what he said was not the policy.

7. I walked back to my hotel and called the intake worker at the law center. She called Mr. Thomas back and then called me back. She told me that Mr. Thomas had given me completely false information. There never was a way for the DCS to issue a voucher that my hotel would accept. Now all he said was that he would call the manager of my hotel and beg him so that my wife and I could stay there over the weekend and pay the rent on Monday. There was nothing else he could do.

8. So my wife and I may be thrown out on the streets on Saturday because of a screw-up that was completely the DCS's fault. They make the checks late, and we pay the penalty. Why should we be homeless because of their mistakes?

9. I'm not just concerned about myself now -- I feel like the real problem is that the program promises us job training and it doesn't give that to us. The whole program doesn't do what it promises.

10. I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this fifteenth day of December, 1983, at Los Angeles, California.

Martin Walley

MARTIN WALLEY

I, RICHARD ANDERSON, declare as follows:

1. My name is Richard Anderson. I live at 941 Cottage Place, Los Angeles.

2. I am enrolled in the Job Training Partnership Act (JTPA) program which is run by the Department of Community Services (DCS) in Los Angeles. The JTPA program is supposedly the new job training program which all employable General Relief recipients were transferred to when they were cut off of General Relief last September and October, 1983. I was one of those people who was cut off the old program and transferred to the new one.

3. The transfer got off to a bad start. The DCS says I was sent a letter with an appointment to go to the Hall of Records to get my job training placement and start the new program. I never received the letter. The way I found out about the new program was: when my check for October did not come, I tried to find out why. I was told that I had been transferred to this new program and sent an appointment which I did not show up for. Because of that I was cut off the program for sixty days. I did not get any money for those two months.

4. This is not the part which has hurt me the most. The worst part is that I have never been assigned any job training at all. All I do is what I did before on General Relief. I have my Work Project at County Hospital cleaning and delivering linens And I do my "Job Search" and turn in my list of turn-downs every month. Nothing new has come into my life because of JTPA. I spent two whole days in the Welfare Office and several at the DCS, went through the sixty day termination, and I am right back

where I started.

5. I have asked repeatedly why I have not been assigned a job training program, as the program promises. I am always given the same answer. There are too many people. The Department of Public Social Services sent over so many people to the JTPA program that there just are not enough slots to go around. I made these arrangements thinking that this new program was going to be something. I am forty-seven years old, and I have worked before in construction, which is a slumping industry. At my age and with my work experience, job training is exactly what I need. I am not going to be able to just go out and find a job on my own. But if this program has "too many people" and "not enough slots," then they would have done better to have just left me on General Relief, where at least there was no promise of anything getting any better.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this fifteenth day of December, 1983, in Los Angeles.

RICHARD ANDERSON

EXHIBIT "A"

POPULATION CHARACTERISTICS

for Los Angeles County less the 7 other Service Delivery Areas.

Population Characteristics:	Number	% of population
Total Population of Area	2,730,921	
Persons in Poverty[1]	335,035	12%
Economically Disadvantaged[1]	558,321	20%
Limited English Language Proficiency	196,896	

	Characteristics of Persons in Poverty (and Economically Disadvantaged)[2]	Characteristics of Los Angeles County General Relief Recipients[3]	Characteristics of Los Angeles County's JTPA "Participant Program Plan"[4]	
			Plan Approved 9-30-83	Revised 10-21-83
I. Client Characteristics-Adults				
A. Total Participants		10,532	4230	9000
B. Male	44.8%	72%	72%	72%
C. Female	55.2%	28%	28%	28%
D-F (Age groups 14-21)				
G. Age 22-44	65.7%[5]		87%	82%
H. Age 45-54	12.3%[5]		6%	6%
I. Age 55 and over	21.9%[5]		7%	12%
J. White (Non-Hispanic)	27.6%	21%	21%	21%
K. Black (Non-Hispanic)	15.4%	49%	49%	29%
L. Asian/Pacific Islander	3.8%	8%	8%	8%
M. American Indian	.7%	1%	1%	1%
N. Hispanic	52.5%	21%	21%	52%
II. Service Parity				
AFDC Adult Recipient				
% of Economically Disadvantaged	11%		2%	3%
% of Persons in Poverty	18%			
III. Other Substantial Segments				
Unemployment Insurance Claimants			-0-	-0-
Limited English Language Proficiency			No target	

---

1. Job Training Partnership Act (I), Planning Information, which cites as its source the Employment Development Department, Employment Data and Research Division, Labor Market Information Section, January 17, 1984. Revision A.
2. "Persons in Poverty Data based on 1980 Census. Data do not relate directly to economically disadvantaged population as defined in JTPA. As the best available data, they are to be used to plan equitable levels of services." (From 1. above, footnote 2.)
   Thus, numbers and percentages on this chart of "Economically Disadvantaged are given where data is available; otherwise statistics are for "Persons in Poverty."
3. Los Angeles County Plan Narrative (JTPA), Approved GR-Employable Caseload, Research and Statistical Services Section, July 11, 1983
4. Los Angeles County Participant Program Plan.
5. Calculated from data on 1 (above) as percentages of adults in poverty.

(Western Center on Law and Poverty, 1-27-84, LTJ)

WESTERN CENTER ON LAW AND POVERTY, INC.

3535 WEST 6th STREET
LOS ANGELES, CALIFORNIA [illegible]
TELEPHONE (213) 487-7211

[illegible]

[illegible]

EXHIBIT "B"

October 6, 1983

Kaye Kiddoo, Director
Employment Development Department
800 Capitol Mall, Room 5000
Sacramento, California 95814

Re: Los Angeles' County JTPA Program Plan, 1983-84
Request for Investigation and Hearing

Dear Mr. Kiddoo:

We are deeply concerned about the County of Los Angeles' recent action in transferring all of its 14,000 General Relief "employables" to the County's JTPA Program. I am enclosing for your information a copy of the complaint we filed on behalf of General Relief recipients in this matter earlier this week.

We request that your office review the approval of the Los Angeles County JTPA plan and other concerns raised herein pursuant to your authority under California Unemployment Insurance Code § 15028.

Background

It is important to note at the outset that the County[1] did not allow for public review and comment on its proposed plan as provided for in Un. Ins. C. § 15045. Therefore, the following description of the County's plan includes a job training scheme that was developed with negligible input from community sources (See, Un. Ins. C. § 15000).

---

[1] Reference to the 'County' generally implies those agencies involved in the development of the JTPA plan and who are defendants in the lawsuit Venzor v. Tanaka (Board of Supervisors, Private Industry Council, Department of Public Social Services and Community Services) unless otherwise noted.

NORTHERN CALIFORNIA OFFICE [illegible] Director
[illegible]

The County Board of Supervisors (Board), Department of Public Social Services (DPSS) (administers the General Relief program) and Department of Community Services (DCS) (administers the JTPA program) developed the JTPA program for the 1983-84 program year. What they proposed to the Private Industry Council (PIC) upon its formation was a sharp departure from the County's job training activities under the Comprehensive Employment and Training Act (CETA) program. The Board, DPSS and DCS decided to focus its *entire* JTPA program on General Relief (GR) recipients.2/

In internal memorandums dated August 3, 1983 and August 29, 1983 respectively, DPSS proposed the termination of all GR-employable recipients and their transfer to the JTPA program effective October 1, 1983.3/ The basis for these terminations was that these individuals were now eligible to receive a 'JTPA stipend'. The 'JTPA stipend' was to be paid with DPSS funds (formerly GR recipients' stipends) transferred to DCS and administered to JTPA service providers for distribution to GR-JTPA trainees. This overall concept was embodied into the County's JTPA plan which was approved by the PIC on August 11, 1983 and the Board on August 16, 1983.

On September 1, 1983 the County DPSS terminated 9,000 GR recipients and refused applications from 5,000 persons seeking aid based on their eligibility for the JTPA program. This action was taken *before* the County Plan had received approval from the State Job Training Council (Council)). Thereafter, at a meeting

---

2/ The County has a duty to relieve its poor under Welfare & Institutions Code § 17000, thus the General Relief program is set up to aid county residents.

3/ The Board, DPSS and DCS has eliminated the GR-employable program as of October 1, 1983. All GR applicants seeking County aid are immediately transferred to the JTPA program.

between the Council and the County the plan received interim approval if certain changes were made in the plan: most notably, the Council requested that, inter alia, the County serve not only GR recipients in its training program.4/ Of course, the Council did not know that the County had already terminated and refused relief to 14,000 GR recipients based on their eligibility for the training program.5/

The County submitted the requested modifications to the Council on September 23, 1983 and received Council approval of its plan on September 30, 1983. The PIC and Board did not review the final plan submitted to the Council and were notified of its contents after final Council approval on the 30th.

At present, approximately 4,000 ex-GR recipients have dropped out during the transition from GR to JTPA. The County has 9,000 JTPA training slots and currently has 10,000 GR recipients waiting to receive notice of job placement and training.6 Although the County changed its 'GR-only' focus in its original JTPA plan in response to the Council's request in mid-September, we fail to comprehend how the County can give credence to its modified plan which focusses on populations other than GR recipient: While the County altered its 'GR-only' language in its modified plan submitted to the Council, it did not alter the target group characteristics of JTPA adult trainees. Therefore, the current County JTPA plan targets the GR client population originally proposed:

4/ The Council requested other changes in the County JTPA plan not discussed here.

5/ It is this action which is the focus of the Venzor v. Tanaka lawsuit.

6/ The majority of these 10,000 individuals have not received job placement (or training) because the Board did not approve funding for JTPA service providers until October 6, 1983.

	Planned Terminations/Adult[7] Number/%
Male	6480/72
Female	2520/28
White	1890/21
Black	4410/49
Asian	720/8
Hispanic	1890/21

Moreover, the plan proposed to terminate 180/2% AFDC registrants out of a total 9000 planned adult terminations.

While there is no doubt that the GR population needs and can benefit by job training the County's participant group characteristics excludes great numbers of women/AFDC recipients/ non-English speaking persons and other groups which were served under CETA. This is against the intent of the federal and state job training laws and should be addressed by your office and the Council. (See Un. Ins. C. §§ 15010, 15011, 15020, 15043). Further, we suggest that the County's actions are also in violation of numberous state and federal nondiscrimination laws.

Please advise us of your intended actions pursuant to this request. We join you in seeking to develop a job training program truly responsive to and reflective of our communities' needs.

Sincerely,

CARMEN A. ESTRADA
Staff Attorney

CAE/dk

cc: L.A. County Board
Private Industry Council
Department of Community Services
Department of Public Social Services

---

[7] The County plan does not designate the number/percentage of adult enrollments by category.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY
GEORGE DEUKMEJIAN, Governor
EMPLOYMENT DEVELOPMENT DEPARTMENT (916) 445-9212
800 Capitol Mall, Sacramento, CA 95814

October 19, 1983

REFER TO:
53:86:ccr

Carmen A. Estrada, Esq.
Western Center on Law and
Poverty, Inc.
3535 West 6th Street
Los Angeles, CA 90020-2898

Dear Ms. Estrada:

COUNTY OF LOS ANGELES JOB TRAINING PLAN --
REQUEST FOR INVESTIGATION

This letter is to acknowledge receipt of your correspondence dated October 6, 1983 requesting an investigation of the job training plan developed in the County of Los Angeles service delivery area under the provisions of the Job Training Partnership Act and Family Economic Security Act.

In accordance with the requirements of the California Unemployment Insurance Code, I am initiating an investigation of your complaint with respect to the requirements of the Job Training Partnership Act and the Family Economic Security Act. I have selected Mr. David Paulsen of my staff to conduct the investigation and gather information upon which to issue a Declaration of Facts pursuant to the Unemployment Insurance Code.

I will, of course, supply you with a copy of the Declaration of Facts when it is issued.

Sincerely,

K. R. Kiddoo
K. R. KIDDOO
Director

cc: Hon. Mike Antonovich, Chairman, Los Angeles County Board of Supervisors, 500 W. Temple Street, Los Angeles, CA 90012
Mr. Berwyn N. Fragner, Chairman, Los Angeles County SDA Private Industry Council, One Space Park, Redondo, CA 90278
Karl Grossenbacher, Chief, Job Training Partnership Office
Theodore Bruinsma, Chairman, State Job Training Coordinating Council

WESTERN CENTER ON LAW AND POVERTY, INC.

3535 WEST 6th STREET
LOS ANGELES, CALIFORNIA 90020-2898
TELEPHONE (213) 487-7211

ALAN RADER
Executive Director

MARY S. BURDICK
Senior Counsel

PHILIP H. HENDERSON
Administrator

October 21, 1983

Director Kaye Kiddoo
Employment Development Department
800 Capitol Mall, Room 5000
Sacramento, California 95814

Re: Los Angeles County JTPA Program Plan 1983-84
Requests for Investigation and Hearing

Dear Director Kiddoo:

I am in receipt of your letter of October 19, 1983 regarding the request made in my letter of October 6, 1983.

The situation in Los Angeles County with respect to its administration of the JTPA job training program has not improved since my original correspondence. There are currently only a handful of executed contracts with service providers and there remain thousands of ex-General Relief (GR) recipients awaiting placement and training in the County's program. We continue to receive reports of individuals seeking to enroll in the job training program but who are denied access because they are not on the GR program.

Additional elements of the County's proposed program should be reviewed by the State Job Training Coordinating Council and your office. First, we are deeply concerned with the County's proposed 9,000 adult training slots which were approved by the Council on September 29, 1983. While the County doubled its original proposed 4500 slots in order to meet the Council's concerns it did not increase the monetary allocation of the per participant costs. Currently, the County is offering service providers approximately $1,500 per participant costs for JTPA training. This figure includes the $228 stipend for ex-GR recipients. This amount is extremely low and conflicts sharply with the $5000-$7000 per participants' average costs in similar programs both in Southern California and on a statewide level. Clearly, the County must offer the small amount in order to provide "services" to the thousands of terminated GR recipients. But this incredibly low amount will only result in job training participants being warehoused, and pushed through the program as soon as possible so that service providers can recoup their losses. Assuming a $228 per month allocation (plus $20 for transportation costs) is included in the $1500 allocation, a service provider will be able to provide only the minimum eight week training for all participants in order to clear $1,000 for training and administration costs. We urge that the State Council rescind its approval of the 9000 slots, reinstate its original approval of 4500 slots at a more reasonable per participant cost.

Second, we request specific review of the County's allocation of over $2.6 million dollars to itself for provision of "County work experience". In essence, the County is allocating money to itself in order to provide "job training" to ex-GR recipients in County jobs. This is in direct contravention to the purpose and intention of the federal JTPA law which specifically eliminates the public service employment program which existed previously under CETA as Title VI. The County's proposed "County work experience" cannot be taken seriously as a bona fide attempt to provide job training services to the County's eligible JTPA recipients. It is inconceivable that the State Council and Employment Development Department would allow such a large allocation of money for what essentially amounts to County Workfare and not a credible job training program.

The Council and State Job Training Partnership office's continued monitoring of the situation in Los Angeles County is sorely needed to counter the flagrant abuses so far exhibited by the County in the use of federal funds.

Sincerely,

Carmen A. Estrada

CARMEN A. ESTRADA
Staff Attorney

CAE/dk

cc: Theo A. Bruinsma
Hon. Mike Antonovich
Mr. Berwyn N. Fragner
Karl Grossenbacher
David Paulsen

WESTERN CENTER ON LAW AND POVERTY

MEMORANDUM

TO: Mr. David Paulsen
Employment Development Department

DATE: November 4, 1983

FROM: Attorneys in Venzor v. Tanaka (Western Center on Law and Poverty and Legal Aid Foundation of Los Angeles)

SUBJECT: Response to Request for Information/Los Angeles County JTPA Investigation.

The following supplements the letters to K. R. Kiddoo dated October 6 and October 21, 1983 and respond to the inquiries made by you in a telephone conversation with Carol Smith on November 4, 1983.

(1) PROBLEMS WITH HOW THE PLAN WAS DEVELOPED

a. Private Industry Council (PIC) participation in selecting General Relief (GR) target group and characteristics for the county plan did not comport to 29 U.S.C. §1513(a) and (b) or Un. Ins. Co. § 15032.

b. There was no or insufficient PIC involvement in adopting a low placement rate for JTPA trainees contrary to the above referenced state and federal statute.

c. There was no PIC involvement or approval of the plan's modification, which was resubmitted to the State on September 23, 1983, which is contrary to the above statutes. The PIC became aware of the changes only after the program began, on October 4, 1983. These changes were significant; for instance, the county doubled its 4500 trainee slots to 9000 - such a change impacts on the training program as a whole.

d. There was no Board of Supervisor approval in the modified County plan as submitted to the State on September 23, 1983 contrary to Un. Ins. C § 15046.

e. There was no public review of the County plan contrary to 29 U.S.C. §1515 and Un. Ins. Co.§15045. In the alternative, the County was required to follow procedures for public review set forth in the Comprehensive Employment Training Act (CETA), 29 USC § 814(a)(2)(C)and (C). and 29 USC §814(a)(3); see also 20 C.F.R. §676.12.

(2) COUNTY PLANS DEFICIENCIES

a. Target participation and placement rates for JTPA trainess (i.e., sex, race, etc.) does not reflect the population characteristics of the poverty population; rather, the targets reflect the GR population characteristics.

b. Plan's placement goal is so low as to offset JTPA intent and purpose.

c. 9000 slots(at approximately $1500 cost per slot) is too many slots for too little money ensuring that all JTPA trainees receive a minimum amount of training (8-12 weeks).

(3) PROBLEMS WITH THE ACTUAL OPERATION OF THE PLAN

a. Since GR's are referred to service providers, there are no applications for services or screening applicants pursuant to Un.Ins.C. §15020(a); only GR applicants are 'screened.'

b. There is no real assessment of eligible participant's employment potential and training needs as required by Un. Ins. C. §15020(b). The County's assessment is, at best, superficial and unrealistic.

c. There is no job search assistance with "special emphasis on nontraditional jobs in the private sector for women" as required by Un.Ins.C.§15020(c).

d. It appears the County may be exceeding its 15% administrative fund limit to administer the JTPA Program.

e. JTPA requires 40% of the program enrollees to be youth, ages 16-21; the County's youth program focusses on youth, age 18-21, which are GR eligible. Insufficient training is going to youth, age 16-18.

f. The County has not developed an appeals process; standards for training, termination, and other procedures necessary for the operation of the program.

g. Many of the ex-GR recipients are in fact, unemployable. There is no clear process to refer these persons back to the GR-unemployable program.

h. Although various County representatives have verbally presented 'solutions' to the day-to-day problems in the administration of the program (i.e., lost checks; vouchers; emergency needs, etc.), these solutions rarely work and numerous hours are spent by advocates or JTPA trainees trying to remedy problems. There is no workable system in place to address the thousands of inquiries made by trainees on a daily basis.

Western Center on Law and Poverty, Inc.
3535 W. [illegible] • [illegible] • (213) [illegible] 7211

November 10, 1983

Mr. David E. Paulsen
Employment Development Department
Legal Office
800 Capitol Mall
Sacramento, CA 95814

Re: Los Angeles County JTPA Program

Dear Mr. Paulsen:

The local Private Industry Council (PIC) met on November 8, 1983 and approved the following plan changes:

1. incorporated the demographic data for the Service Delivery Area (SDA) provided by the State JTP office and

2. reduced the adult General Relief (GR) recipient target to 75%.

Although the above actions are an improvement over the previous plan the following remains unchanged:

1. The female target remains at a low 28%; this is not reflective of the general population--only the GR population.

2. The 10% AFDC service target rate is still below the equitable service rate.

3 Despite the change in the plan's language - the County still intends to process every ex-GR recipient (nearly 13,000 as of November 1, 1983) which was awaiting placement in the JTPA program. No ex-GR recipient will be taken off the JTPA program. It appears that only additional JTPA placements are intended. This is incredible. Assuming that the 13,000 ex-GR recipients are now only 75% of the target population, the county must be planning to serve an additional 4,300 persons (25% of 17,300) under its plan - which proposes only 9,000 slots!

4. Of the 13,000 ex-GR recipients awaiting JTPA training under the County plan only 2461 will be placed with service providers. The remaining 10,500 will be placed in the County's Work Experience Program and may/or may not receive a day or two of training each week.

5. Recent correspondence (copy attached) from the Director of the Department of Community Services confirms that the County intends to serve 90% adults and 10% youths in the program; while the County will spend 44% of its JTPA monies on the 10% youth enrollees, the 90% adult enrollees will receive only marginal training with 54% of the JTPA funds.

6. The English-as-a-Second Language target group is too low to genuinely reflect the general population's need for JTPA training.

7. The County cannot possibly achieve the modified ethnicity target for Hispanics (from 21% to 52%) if it proceeds to process the 13,000 ex-GR recipients (of which 21% or 2600 are Hispanic) as it plans to do.

The above problems are continuing and supplement those addressed in our meeting of November 7, 1983.

The County's plan modifications are on paper only. The local JTPA program, with PIC support, continues to achieve their original goal: to remove County welfare recipients from the County rolls.

Finally, I was disturbed by the lack of public input allowed at the local PIC meeting. Although members of the public sought to have input during the PIC's discussions of agenda items we were allowed only a three-minute presentation at the end of the meeting, after all decisions were made. The Private Industry Council is a public entity created by federal law. I strongly suggest the State Job Training Partnership Office inform all PICs of their ongoing duty to allow public input--especially the plan development process for the 1984-86 JTPA program year.

I welcome any questions you may have on the above.

Sincerely yours,

Carmen A. Estrada
Staff Attorney

CAE:DA

cc: Kaye Kiddoo
Mike Reilly
SJTCC Members
PIC Executive Committee
Donald Galloway

STATE OF CALIFORNIA HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

EMPLOYMENT DEVELOPMENT DEPARTMENT (916) 445-9212
800 Capitol Mall, Sacramento, CA 95814

December 5, 1983

REFER TO
53:86:ccr

Carmon A. Estrada, Esq.
Western Center on Law & Poverty, Inc.
3535 West Sixth Street
Los Angeles, California 90020

Dear Ms. Estrada:

DECLARATION OF FINDINGS FOR COMPLAINT
AGAINST LOS ANGELES COUNTY SDA

Pursuant to the provisions of section 15029 of the Unemployment Insurance Code, enclosed is a copy of the Declaration of Findings issued on the above-referenced complaint. The Declaration of Findings is the result of a complaint you filed with me on October 6, 1983.

The findings conclude that the issues you raised in your complaint do not violate the provisions of the Job Training Partnership Act or the Family Economic Security Act. However, this department is monitoring the Los Angeles County Service Delivery Area to insure that its operations and administration achieve the intent of the program which is to provide training and employment to eligible participants, which include youth, recipients of aid to families with dependent children and school dropouts.

If the operation and administration of the program are not achieving this intent and corrective action is not taken by the service delivery area, its job training plan may be subject to revocation. The service delivery area may also be responsible for repayment of funds that are not expended in accordance with the acts.

I wish to thank you for the interest you have shown in this employment and training program. In addition, as the department's monitoring activities continue, I solicit information from your organization which may enhance our monitoring efforts.

Sincerely,

K. R. Kiddoo

K. R. KIDDOO
Director

Enclosure

cc: Mike Antonovich
Borwyn N. Fragner
William Huston
Theodore Bruinsma

DECLARATION OF FINDINGS

Complainant: Western Center on Law and Poverty

Service Delivery Area: Los Angeles County

Background:

This declaration of findings relates to the Los Angeles County service delivery area plan for the period October 1, 1983 through June 30, 1984. This declaration of findings is the result of a complaint made by the Western Center on Law and Poverty on October 6, 1983. This declaration of findings is made pursuant to the provisions of section 15029 of the Unemployment Insurance Code.

Issues:

The issues raised by the complainant are as follows:

1. That the service delivery area plan was not developed and approved in accordance with the requirements of the Job Training Partnership Act (hereinafter JTPA) and/or the Family Economic Security Act (hereinafter FESA).
2. That the service delivery area plan improperly "targets" the general relief population for training services.

Findings:

PLAN DEVELOPMENT AND APPROVAL

The service delivery area plan was developed by the County of Los Angeles. The private industry council for the service delivery area (hereinafter SDA) was certified by the Governor on August 1, 1983. Notice of the private industry council (hereinafter PIC) meeting on August 11, 1983 and copy of preliminary agenda was mailed to interested parties on August 8, 1983. The PIC met on August 11, 1983 and gave its concurrence to the plan. Notice that the service delivery area plan (hereinafter Plan) was available for review was published in seven local newspapers on August 12, 13, and 14, 1983.

The Los Angeles County Board of Supervisors reviewed and concurred in the Plan on August 16, 1983. The Plan was forwarded to the Employment Development Department on August 24, 1983. The PIC and the County Board of Supervisors approved their agreement on September 6, 1983 and September 20, 1983, respectively.

The Plan was approved on September 27, 1983.

Chapter 537, Statutes of 1983 was signed by the Governor on July 28, 1983. That statute contained an urgency clause and was intended to implement JTPA. Section 15045 was added to the Unemployment Insurance Code to require a public hearing by the PIC on the proposed Plan with at least 30 days advance notice and a 30-day comment period prior to final adoption of the Plan.

JTPA required that interm plans be submitted by August 31, 1983. The Plan for the Los Angeles County SDA was submitted timely.

Therefore, it is concluded that the Plan was developed, submitted and approved in accordance with JTPA. Strict compliance with section 15045 of the UI Code was not possible due to the time limitations required by JTPA.

PLAN TARGET GROUP

The program narrative for the Los Angeles County SDA Plan provides, at page 1, as follows:

> "Potentially Eligible Population
>
> "Los Angeles County plans to serve targeted welfare recipients, specifically General Relief (GR), Aid to Families With Dependent Children-Unemployed (AFDC-U), Aid to Families With Dependent Children-Family Group (AFDC-FG), youth (ages 16-21), and other JTPA eligible individuals during this nine-month interim program. The targeted welfare client population, all of whom are unemployed, will make up a large portion of the client population to be served."

Section 141 of JTPA (29 USC 1551) provides, in part, as follows:

> "Except as otherwise provided, the following conditions are applicable to all programs under this Act: (a) Each job training plan shall provide employment and training opportunities to those who can benefit from, and who are most in need of, such opportunities and shall make efforts to provide equitable services among substantial segments of the eligible population."

* * *

Neither JTPA nor FESA prohibit an SDA Plan from targeting its employment and training opportunities for an identified segment of the eligible population, so long as youth, recipients of Aid to Families With Dependent Children and school drop-outs are properly served.

It is concluded that this Plan contains provisions to satisfy the employment and training services to the groups identified in JTPA.

Dated: November 29, 1983

Original signed by

K. R. KIDDOO
Director
Employment Development Department

cc: State Job Training
Coordinating Council
T. Brunsma, Chairman

WESTERN CENTER ON LAW AND POVERTY, INC.

3535 WEST 6th STREET
LOS ANGELES, CALIFORNIA 90020-2898
TELEPHONE (213) 487-7211

ALAN RADER
Executive Director
MARY S. BURDICK
Senior Counsel

[illegible]

December 29, 1983

K. R. Kiddoo
Director
Employment Development Department
800 Capitol Mall
Sacramento, California 95814

Re: Los Angeles County Program
53:86:ccr

Dear Mr. Kiddoo:

I am in receipt of your letter of December 5, 1983 regarding the 'Declaration of Findings for Complaint Against Los Angeles County SDA'. I appreciate the intent of your office in conducting the investigation but am disturbed by the superficiality of the findings as finally released.

In a memorandum dated November 4, 1983, directed to the investigator, Mr. David Paulsen of your staff, we set forth sixteen areas of concern regarding the Los Angeles JTPA program. These areas of concern were compressed into two issues in the Declaration of Findings. Not all of the issues raised by our complaint have been addressed by your investigative report.

With respect to the County Plan's Target Groups your Findings merely cites the first paragraph of the County's program narrative and concludes that this intent to serve a potentially eligible population comports with 29 U.S.C. 1551 of JTPA. We never questioned this portion of the County Plan nor raised that section of the JTPA law in our complaint. If anything, it is the failure of the County Plan's Client Participant Characteristics & Service Parity Targets (plan attachments) to meet the general intent articulated in the Plan's first paragraph which generated our complaint. Despite State intervention and subsequent modifications regarding ethnicity and other goals the Los Angeles County JTPA program persists in serving inter alia, only 48% women, 10% AFDC recipients and a minimal number of non-English speakers. Thousands of eligible JTPA participants are denied job training due to the County's mandatory General Relief-JTPA program.

The above illustration is only one example of the deficiencies contained in your office's Declaration of Findings dated December 5, 1983. What additional avenues of appeal are available to us under the process afforded by Unemployment Ins. C. § 15029? And, what additional action can we anticipate from your office - or is your letter of December 5 the final action with respect to our complaint.

Sincerely,

/s/

CARMEN A. ESTRADA
Staff Attorney

CAE/dk

STATE OF CALIFORNIA - HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

EMPLOYMENT DEVELOPMENT DEPARTMENT
800 Capitol Mall, Sacramento, CA 95814 (916) 445-9212

January 25, 1984
REFER TO:
53:86:ccr

Carmen A. Estrada
Western Center on
Law and Poverty, Inc.
3535 West 6th Street
Los Angeles, CA 90020-2898

Dear Ms. Estrada:

This letter is in response to your letter dated December 29, 1983.

I must respectfully disagree with your statements concerning my Declaration of Findings, dated December 5, 1983. My findings were neither superficial nor deficient with respect to those issues raised in your request for an investigation that were within my authority as the Governor's administrator of the Job Training Partnership Act in California.

Your request for an investigation under section 15029 of the Unemployment Insurance Code voiced your general dislike for the Job Training Partnership Act program in the Los Angeles County service delivery area and your view that the program provided for the general relief recipients differently than they had previously been served by the county.

Under the Job Training Partnership Act, the expenditure of federal funds for employment and training is to be administered at the local service delivery area level. Congress provided general basic requirements for the service delivery areas to satisfy in order to receive the federal funds. The role of the Governor, as delineated by Congress, is to designate the service delivery areas, certify the private industry council, and approve the job training plan which is to be developed and prepared at the local level, i.e., the service delivery area. The job training plan need only satisfy the general guidelines established by Congress.

During the operation of the program the Governor has the responsibility to review, monitor, and audit the service delivery areas to ensure that the funds are being expended in accordance with the Act. The Act requires that 40% of the funds available in the service delivery area be expended to provide services to eligible youth. The Act further provides that recipients of payments of Aid to Families With Dependent Children and eligible school dropouts be served on an equitable basis. So long as a service delivery area operates its program to deliver employment and training services within the described broad guidelines the Governor has limited enforcement authority.

In addition, Congress has adopted the concept that the success of Job Training Partnership Act is to be measured by "performance". The basic measure of performance is the increase in employment and earnings and reduction in welfare dependency due to participation in the program. The United States Department of Labor was assigned the responsibility of developing the "performance standards" to be used as the measure of success for the program. Until such time as data is available which establishes that a program is not meeting performance criteria, the role of the Governor is one of oversight. The Governor is required to provide technical assistance to those programs that do not meet performance criteria. The Governor must impose a reorganization plan, which may include restructuring of the private industry council, prohibiting the use of designated service providers, and other measures to improve performance, if the failure to meet performance standards persists for a second year.

The local area has wide latitude with respect to program design and operation with limited intervention by the Governor until such time as the performance standards are not satisfied for two program years.

Therefore, my Declaration of Findings properly addresses those issues you raised which are subject to my review and control at this time. The Employment Development Department will continue to monitor the Los Angeles County Service Delivery Area program and assist the administrative entity in achieving the performance standards promulgated by the Department of Labor.

Although there is no appeal process afforded under section 15029 of the Unemployment Insurance Code, the Job Training Partnership Act and the regulations adopted thereunder provide that discrimination complaints may be made directly to the Department of Labor and that other complaints are to be made at the service delivery area level.

In closing, I wish again to thank you for your interest in the Job Training Partnership Act and advise you that it is my desire that the administration of that Act result in a successful employment and training program. However, I may only assist in the success of that program to the degree and in the manner provided by Congress when it enacted the Job Training Partnership Act.

Sincerely,

K. R. Kiddoo

K. R. KIDDOO
Director

Mexican American
Legal Defense
and Educational Fund

[illegible]
Angeles, CA 90017
(213) 383-6952

MALDEF

December 6, 1983

Kaye Kiddoo,
Director
Employment Development Department
800 Capitol Mall, Room 5000
Sacramento, CA 95814

RE: Los Angeles County JTPA Program Plan, 1983/84 Request for Investigation and Hearing

Dear Ms. Kiddoo:

We are concerned about the current Job Training Partnership Act (JTPA) program for adults that the County of Los Angeles is implementing. The initial plan that the County submitted to the State in August indicated that the County planned to transfer all of its 14,000 General Relief recipients to the JTPA program. We are aware that this transfer is the subject of litigation, Venzor v. Tanaka, brought by the Western Center on Law and Poverty.

We, however, request that your office review the current JTPA program (1983-84) for Los Angeles County and other concerns raised herein pursuant to your authority under California Unemployment Insurance Code Section 15028.

1. The County JTPA Plan

The Los Angeles County Board of Supervisors, the Department of Social Services, and the Department of Community Services developed the JTPA program for the 1983-84 program year. These three groups jointly decided to focus the entire JTPA county program on employable General Relief recipients beginning October 1, 1983. These employable General Relief recipients had previously been receiving aid from the County. The County eliminated the General Relief-employable program as of October 1, 1983 and transferred all recipients under this program to JTPA program.

National Office
28 Geary Street
San Francisco, CA 94108
(415) 981-5800

Regional Offices
[illegible] Avenue
Suite 306
Denver, CO 80204
[illegible]

1636 West Eighth Street
Suite 319
Los Angeles, CA 90017
(213) 383-6952

517 Petroleum Commerce Bldg
201 North St. Mary's Street
San Antonio, TX 78205
(512) 224-5476

1411 K Street NW
Suite 300
Washington, DC 20005
(202) 393-5111

* Contributions Are Deductible for US Income Tax Purposes

The County planned to pay these individuals a JTPA stipend out of the county general fund. The individuals had to present themselves to job training programs funded with JTPA funds and were to receive JTPA training. This overall scheme was contained in the County's JTPA plan which was approved by the Private Industry Council (PIC) on August 11, 1983 and by the Board of Supervisors on August 16, 1983.

Since the initial approval by the PIC in August, the county plan has been modified twice. At the request of the State Council, the county submitted modifications on September 23, 1983. The Council had asked that the County's plan be modified to serve not only General Relief recipients. With this and other modifications, the Council approved the county plan on September 30, 1983.

Several weeks ago, the County further modified its target goals to include, among others, a change of the Hispanic target goal from its original 21% to 50%.

2. The County's JTPA Program Continues to Exclude Eligible Persons

MALDEF's concern with the County's actions thus far this program year is that the focus on General Relief recipients to the exclusion of other eligible groups, including Hispanics and women, is in contravention of the intent and language of the Job Training Partnership Act.

While the County has altered its "General Relief-Only" language in its JTPA plan and has changed the target goal for Hispanics, the County's JTPA program has continued to serve only General Relief recipients. Our understanding from community sources is that the county has negotiated contracts with job training agencies which require these agencies to serve only General Relief recipients which the county refers to them.

Therefore, the current JTPA program being implemented by the county targets the General Relief client population originally proposed in August:

Male	6480/72%
Female	2520/28%
White	1890/21%
Black	4410/49%
Asian	720/8%
Hispanic	1890/21%

The County had approximately 9,000 JTPA training slots beginning in October and had 10,000 General Relief recipients waiting to be placed in these slots at that time. Thus, even if the County changes its target group percentages, this is a change in name only. In fact, only General Relief recipients will be served if the service providers are required by contract to fill the training slots with General Relief recipients.

While the Job Training Partnership Act does not require that the county serve women and minorities on a parity basis, the Act does prohibit discrimination. It is our position that the County's program, which continues by design and intent to service only a General Relief client population, discriminates against groups which are eligible for services such as women, AFDC recipients 1/, and Hispanics.

While we do not dispute that General Relief recipients have job training needs. But, a focus on this group only, to the exclusion of other groups such as AFDC recipients, women and Hispanics, cannot be justified. These groups have specific job training needs and must be served.

The focus on General Relief recipients by the county is against the intent of the federal and State job training laws. Additionally, we believe this focus is in violation of state and federal nondiscrimination laws.

Therefore, we respectfully request that you investigate the possible exclusion of AFDC recipients, women and Hispanics from the JTPA program being administered by the County of Los Angeles for 1983-84. Please inform me of any action you intend to take or have taken to correct this problem.

Sincerely,

Maria Rodriguez

Maria Rodriguez
Attorney at Law

MR:xg

1/ The Job Training Partnership Act specifically requires that AFDC recipients be equitably served.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

EMPLOYMENT DEVELOPMENT DEPARTMENT (916) 445-9212
800 Capitol Mall, Sacramento, CA 95814

December 19, 1983

DEC 22 1983

REFER TO

53:86:ccr

Maria Rodriguez, Esq.
Mexican American Legal
Defense and Education Fund
1636 West Eighth Street, Suite 319
Los Angeles, California 90017

Dear Ms. Rodriguez:

COUNTY OF LOS ANGELES JOB TRAINING PLAN --
REQUEST FOR INVESTIGATION

This letter is to acknowledge receipt of your correspondence dated December 6, 1983 requesting an investigation of the County of Los Angeles service delivery area under the provisions of the Job Training Partnership Act and Family Economic Security Act.

In accordance with the requirements of the California Unemployment Insurance Code, I am initiating an investigation of your complaint with respect to the requirements of the Job Training Partnership Act and the Family Economic Security Act. I have selected Mr. David Paulsen of my staff to conduct the investigation and gather information upon which to issue a Declaration of Facts pursuant to the Unemployment Insurance Code.

I will, of course, supply you with a copy of the Declaration of Facts when it is issued.

Sincerely,

K. R. Kiddoo by Esther Rushford Greene
K. R. KIDDOO
Director

cc: Hon. Mike Antonovich, Chairman, Los Angeles County Board of Supervisors, 500 W. Temple Street, Los Angeles, CA 90012
Mr. Berwyn N. Fragner, Chairman, Los Angeles County SDA Private Industry Council, One Space Park, Redondo, CA 90278
Karl Grossenbacher, Chief, Job Training Partnership Office
Theodore Bruinsma, Chairman, State Job Training Coordinating Council

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY
GEORGE DEUKMEJIAN, Governor

EMPLOYMENT DEVELOPMENT DEPARTMENT
800 Capitol Mall, Sacramento, CA 95814 (916) 445-9212

RECEIVED
[illegible]

January 31, 1984
REFER TO
53:86:ccr

Ms. Maria Rodriguez
Attorney at Law
Mexican/American Legal Defense & Education Fund
1636 West 8th Street, Suite 319
Los Angeles, CA 90017

Dear Ms. Rodriguez:

DECLARATION OF FINDINGS FOR COMPLAINT
AGAINST LOS ANGELES COUNTY SDA

Pursuant to the provisions of section 15029 of the Unemployment Insurance Code, enclosed is a copy of the Declaration of Findings issued on the above-referenced complaint. The Declaration of Findings is the result of a complaint you filed with me on December 6, 1983.

The findings conclude that the issue you raised in your complaint with respect to contracts with service providers do not violate the provisions of the Job Training Partnership Act or the Family Economic Security Act. However, if the use of that contracting system results in the failure of the Los Angeles County service delivery area to meet the performance standards as specified in the Act, the service delivery area will be subject to corrective action.

I wish to thank you for the interest you have shown in this employment and training program.

Sincerely,

K R Kiddoo

K. R. KIDDOO
Director

Enclosure

cc: Mike Antonovich
Berwyn N. Fragner
William Huston
Theodore Bruinsma

DECLARATION OF FINDINGS

Complaint: Mexican/American Legal Defense & Educational Fund

Service Delivery Area: Los Angeles County

Background

This Declaration of Findings relates to the operation of the Los Angeles County service delivery plan for the period October 1, 1983 through June 30, 1984. This Declaration of Findings is the result of a complaint made by the Mexican American Legal Defense & Educational Fund on December 6, 1983. This Declaration of Findings is made pursuant to the provisions of section 15029 of the Unemployment Insurance Code.

Issue

The issue raised by the complainant is as follows:

That the administrative entity for the Los Angeles County service delivery area has negotiated contracts with service providers to provide training to participants which require the service providers to enroll only those general relief recipients referred to them by the administrative entity for the service delivery area.

Findings

The contracts utilized by the administrative entity for the Los Angeles County service delivery area, Department of Community Services, do not specify that only general relief recipients may be enrolled by the service providers. Because the job training plan for the SDA targets general relief recipients for training under JTPA, the Department of Community Services may advise the service providers during contract negotiations or through program bulletins of the relative number of general relief recipients and other eligible participants that the service provider may enroll in training. The Department of Community Services is responsible for the referral of general relief recipients to the service providers. It is the responsibility of the service provider to recruit the other eligible participants into the program for the available training positions.

Declaration of Findings
Mexican/American Legal Defense
and Educational Fund

CONCLUSION

It is my conclusion that the methodology utilized by the administrative entity for the Los Angeles County SDA does not violate the provisions of the Job Training Partnership Act. Such system may be used within the SDA until such time as data are available that indicate that the SDA is not meeting performance standards imposed by the Act and that such system has contributed to the failure to meet said performance standards. If such failure to meet performance standards does occur, the service delivery area may be subject to corrective action.

Dated: January 31, 1984

K. R. KIDDOO
Director
Employment Development Department

cc: State Job Training Coordinating Council

EXHIBIT "C"

CARMEN A. ESTRADA
MARY BURDICK
WESTERN CENTER ON LAW & POVERTY, INC.
3535 West 6th Street
Los Angeles, California 90020
(213) 487-7211

JOHN HUERTA
MARIA RODRIGUEZ
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATION FUND
1636 West 8th Street
Los Angeles, California 90017
(213) 383-6952

BYRON GROSS
LEGAL AID FOUNDATION OF
LOS ANGELES
1550 West 8th Street
Los Angeles, California 90017
(213) 487-3320

Attorneys for Complainants

BEFORE THE UNITED STATES DEPARTMENT OF LABOR

OFFICE OF CIVIL RIGHTS

GRACE MADRID, CECILIA MARIE SESANTO, RITA NERIA, individually and on behalf of all others similarly situated,

Complainants,

-vs-

BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES AND THE INDIVIDUAL MEMBERS THEREOF, DONALD GALLOWAY, Director of the Los Angeles County Department of Community Services, LOS ANGELES COUNTY PRIVATE INDUSTRY COUNCIL,

Respondents.

NO.

ADMINISTRATIVE COMPLAINT

I

NATURE OF PROCEEDINGS

1. Complainants file this Administrative Complaint with the Regional Director, Office of Civil Rights of the United States Department of Labor, Region IX pursuant to the Jobs Training Partnership Act of 1982 (hereinafter "JTPA"), 29 U.S.C. § 1501 et seq., and its implementing regulations, 20 C.F.R. § 629. Complainants seek appropriate sanctions against respondents' practices of unlawful discrimination in the allocation and utilization of federal funds which were granted to the respondent County of Los Angeles, as a Service Delivery Area (SDA) under JTPA.

2. This Complaint is filed on behalf of economically disadvantaged women, recipients of Aid to Families with Dependent Children (AFDC-FG) and persons over the age of 45, in the County of Los Angeles, California, who are eligible for benefits under JTPA. Respondents have failed and refused to implement the provisions of JTPA, the regulations promulgated thereunder, Title IX of the Education Amendments of 1972, which prohibit age and sex discrimination in JTPA programs, and have thereby violated those statutes and regulations. Respondents' failure to fulfill its assurances of non-discrimination in JTPA programs has had and continues to have the effect of discriminating against women and AFDC recipients on the basis of sex and age thereby injuring persons on whose behalf the complaint is brought.

///

II

JURISDICTION

3. JTPA provides that SDA grantees shall not discriminate on the basis of, inter alia, sex and age in any JTPA funded program, 29 U.S.C. § 1577 and shall provide equitable services to AFDC recipients, 29 U.S.C. § 1603. Interim guidelines published in the Federal Register on September 28, 1983 provide the Department of Labor, Office of Civil Rights with jurisdiction over the matters raised in this Complaint.

III

FACTS

4. The County of Los Angeles[1] receives JTPA funds and maintains a JTPA program for its economically disadvantaged County residents. In filling the positions made available under JTPA, respondents discriminated on the basis of sex and age against women and AFDC-FG recipients and excluded them from full participation in the opportunities and benefits of the JTPA programs.

5. The County's JTPA program plan, (attached hereto as Exhibit A) approved on September 30, 1983, adopted as its program participant targets the general characteristics of its

---

[1] The 'County of Los Angeles' or 'County' shall be used in reference to respondents unless otherwise indicated.

General Relief (GR) population.[2/] This population is primarily single, male, Black, English-speaking, and averages 37 years in age; similarly, as county welfare recipients, this population does not receive AFDC benefits. The County Plan makes reference to limited service to recipients of AFDC-Unemployed benefits, which are two-parent families[3/] and no mention of AFDC-Family group recipients which are usually single, female heads-of-household.

6. The County's economically disadvantaged population exceeds 558,000 and includes a diverse population, including 55% women and large numbers of AFDC recipients and ethnic and older females. Respondents have revised the JTPA plan's ethnic targets in response to the State JTPA office's request

---

2/ The GR population is only a small percentage, approximately 3-5%, of the County's economically disadvantaged population. The County's action in mandatorily transferring 15,000 GR recipients is the focus of a separate lawsuit filed on behalf of those persons on October 3, 1983, Venzor v. County of Los Angeles, which is attached hereto as Exhibit B. The issues raised in Venzor are not those raised in the instant complaint.

3/ In two parent families the usual recipient of training will be the male parent whose employment history makes placement more likely.

(see revised "Participant Program Plan" attached as Exhibit C).[4] Despite these changes, respondents continue to have service target rates for women and AFDC recipients that do not reflect their proportion in the JTPA eligible population:

Los Angeles County Planned Termination/Adult[5]	
Female -	28%
AFDC recipients -	3%
Age 45-54 -	6%
Age 55 and over -	12%

7. In contrast, the JTPA eligible population for the above categories is as follows:[6]

Economically Disadvantaged Persons Los Angeles County	
Total Population	2,730,921
Economically Disadvantaged	558,321
Female -	55.2%
AFDC recipients -	11%
Age 45-54	12.3%
Age 55 and over -	21.9%

---

[4] In addition, respondents have allegedly decreased the percentage of GR recipients to be served on its JTPA program from 100% in October, 1983, to 90% in November, 1983 and finally to 75% in December, 1983. Two requests for investigation alleging violations of the State JTPA law, Family Economic Security Act. California Un.Ins. C. § 15,000 *et seq.*, were filed in 1983 and are attached hereto as Exhibit D. Those requests do not effect the claims or issues raised herein.

[5] The County does not designate the number/percentage of adult enrollments by category.

[6] See Los Angeles County JTPA Planning Information, Employment Development Department, (1/17/84) and Population Characteristics table prepared by Western Center on Law and Poverty attached as Exhibit E.

8. Respondents have failed and refused to place females, older females, and AFDC-FG recipients in JTPA training in equitable and representative numbers. In determining the uses to which JTPA funds would be put, and in designating or creating positions for JTPA funding, respondents have violated the purpose and provisions of JTPA which require that such programs "... prepare ... unskilled adults for entry into the labor force and afford job training to those economically disadvantaged individuals ... facing serious barriers in employment, who are in special need of such training to obtain productive employment." 29 U.S.C. § 1501; see also, 29 U.S.C. § 1551.

IV

COMPLAINANTS

a. Individual Complainants

9. Each Complainant in this case applied for County JTPA job training and was not accepted as a result of the County's practice of mandatorily referring County welfare individuals to JTPA service providers (See complainants' declarations attached as Exhibit F). Each complainant is economically disadvantaged and eligible for JTPA funded training. Each complainant is either a female, over the age of 45 or an AFDC recipient. Each complainant was discriminatorily denied entrance into the JTPA program because of their sex, age or status as an AFDC recipient.

///

///

b. The Class

10. The County's policy and JTPA target goals impact on thousands of economically disadvantaged persons who are denied job training on the basis of their sex, age or AFDC status. Complainants adequately represent the class in this case and seek to change the County's job training program so that all groups are equitably served.

V

LEGAL CLAIMS

a. Title IX

11. Title IX of the Education Amendments of 1972 prohibit discrimination on the basis of sex. The County's failure to target women for JTPA services in their proportion in the JTPA eligible population violates Title IX.

b. 29 U.S.C. § 1577(a)(2)

12. The Jobs Training Partnership Act, 29 U.S.C. § 1577(a)(2) provides that "no individual shall be excluded from participation in, denied the benefits of, [or] subjected to discrimination under ... any such program because of ... sex ... [or] age ..." The County's policies and JTPA plan target rates violates 29 U.S.C. § 1577.

///

///

c. 29 U.S.C. § 1603(b)(3)

13. The Jobs Training Partnership Act, 29 U.S.C. § 1603(b)(3) provides that AFDC recipients "shall be served on an equitable basis, taking into account their proportion of economically disadvantaged persons ... in the area." The County's 3% AFDC adult service target violates 29 U.S.C. § 1603(b)(3). Further, the County's primary focus on AFDC-Unemployed to the exclusion of AFDC-Family Group violates this section.

VI

REQUEST FOR RELIEF

14. The Los Angeles County JTPA Program for 1983-84 fails to comply with the statutory and regulatory prohibition against discrimination under Title IX, JTPA and applicable regulations. Respondents will not cease their discriminatory practices and policies unless compelled to do so by the Department of Labor, Office of Civil Rights.

WHEREFORE Complainants request that the Office of Civil Rights find Respondents' administration of the JTPA program unlawful, inadequate, and discriminatory, and revoke Respondents' existing JTPA Plan, and provide for affirmative measures of relief by taking the following actions:

///

///

(a) Cause a prompt investigation to be made of the facts and circumstances alleged in this complaint;

(b) Issue a determination within the 120 day statutory time limit that the respondents have failed to comply with Title IX, JTPA and their governing regulations;

(c) Require respondents to revise their JTPA Plan as follows:

(1) Reformation of the Plan to eliminate all forms of discrimination against women in all JTPA programs;

(2) Reformation of the Plan to eliminate all forms of discrimination against AFDC-FG recipients;

(3) Reformation of the Plan to eliminate all forms of discrimination against persons over the age of 45;

(4) Reformation of the Plan so that JTPA services be provided to the above groups on an equitable basis;

///

(5) Inclusion of any other provision or program necessary to remedy each of the failures and omissions set forth in this Complaint.

(d) Granting complainants reasonable attorneys' fees;

(e) Granting such other and further remedial provisions and orders as may be necessary or appropriate to fully effectuate the purpose of JTPA to overcome the effects of lack of employment skills and opportunities as applicable to women, AFDC recipients and older persons in the County of Los Angeles.

DATED: February 7, 1984.

Respectfully submitted,

CARMEN A. ESTRADA
MARY BURDICK
JOHN HUERTA
MARIA RODRIGUEZ
BYRCN GROSS

By Carmen A Estrada
CARMEN A. ESTRADA

Attorneys for Complainants

MAJORITY MEMBERS
AUGUSTUS F. HAWKINS, CALIF., CHAIRMAN
WILLIAM (BILL) CLAY, MO.
BALTASAR CORRADA, P.R.
PAUL SIMON, ILL.
MATTHEW G. MARTINEZ, CALIF.
PAT WILLIAMS, MONT.
RAY KOGOVSEK, COLO.
MAJOR R. OWENS, N.Y.
FRANK HARRISON, PA.
GARY L. ACKERMAN, N.Y.
CHARLES A. HAYES, ILL.
CARL D. PERKINS, KY., EX OFFICIO
(VACANCY)

(202) 225-1927

COMMITTEE ON EDUCATION AND LABOR
U.S. HOUSE OF REPRESENTATIVES
B-346A RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515

SUBCOMMITTEE ON EMPLOYMENT OPPORTUNITIES

MINORITY MEMBERS
JAMES M. JEFFORDS, VT.
JOHN N. ERLENBORN, ILL., EX OFFICIO
STEVE GUNDERSON, WIS.
WILLIAM F. GOODLING, PA.
E. THOMAS COLEMAN, MO.
THOMAS E. PETRI, WIS.
STEVE BARTLETT, TEX.
HOWARD C. NIELSON, UTAH

February 28, 1984

Mr. Kay Kiddoo
Director
Employment Development Department
State of California
800 Capitol Mall
Sacramento, California 95814

Dear Mr. Kiddoo:

The recent hearing of the Subcommittee on Employment Opportunities in Los Angeles raised a number of concerns with respect to the Los Angeles County Job Training Partnership Act plan. I do not believe that these issues were adequately addressed by the Employment Development Department at the time the Los Angeles County plan was approved or in the response to the complaint against Los Angeles County filed with the Employment Development Department by the Western Center on Law and Poverty.

The testimony and documentation presented to the Subcommittee at its February 14 hearing call into question whether the Los Angeles County program is in compliance with the Job Training Partnership Act.

Maintenance of Effort

In its explanations of the Los Angeles County plan, the County states its intent to use Federal JTPA funds to offset County welfare costs. In a January 6, 1984 memorandum to the Board of Supervisors, County Administrative Officer Harry Hufford describes the intended program benefit: "By utilizing a portion of the allocated Job Training Partnership Act funds, the County has avoided the expenditure of County General Funds that would have otherwise been spent for public assistance." . . . "We projected that implementation of the program would save the County $4.0 million based in part on the fact that Job Training Partnership Act (JTPA) funds could be used for some of the participant stipends." This stated intent appears to be in direct violation of Section 141(b) which requires JTPA funds to be in addition to funds which would otherwise be expended in the absence of the JTPA monies.

Targeting/Substantial Segments

The Los Angeles County plan focuses on the General Relief population which represents only 3-5% of the total eligible population. Only 14% of the funds are available to serve all other non-General Relief adults. Section 141(a) of the Job Training Partnership Act requires Service Delivery Areas to "make efforts to provide equitable service among substantial segments of the eligible population." It appears that the Employment Development Department's review of the Los Angeles County plan only addressed whether identified segments of the eligible population were being served at all, not whether the plan satisfied the requirement under the Act for equitable service. By no stretch of the imagination can the plan be viewed as providing equitable service when it concentrates service on only 5% of the eligible population while serving the remaining 95% of the adult population with only 14% of the funds. Moreover, it appears that the County has chosen to serve particular groups -- including youth, older workers, minorities, etc. from within the General Relief population, not from the eligible population as a whole.

Non-SDA Participants

Because it is attempting to serve the entire county-wide General Relief employable population under its JTPA grant, the Los Angeles County plan indicates that 39% of the participants will reside outside the Los Angeles County Service Delivery Area. Section 141(e) authorizes only "limited exceptions" to the residency requirement for participation in employment and training activities funded under Title II. Los Angeles County's substantial deviation from the residency requirement goes far beyond the intent of the law. With funds for training already substantially reduced from the level available to the County in prior years, it is unclear what justification can be offered for using these limited funds to serve residents of other Service Delivery Areas.

Placement Rate

The Los Angeles County plan projects a placement rate of only 32.4%. This rate is substantially below the national target of 50.4%. Testimony presented to the Subcommittee indicates that this low target is as much a result of the quality and duration of training being provided as it is an indication of the characteristics of the target group. It is not clear what standards the Employment Development Department utilized to approve such a substantial deviation and whether these standards were applied to other Service Delivery Areas in the State. In addition to the question which the placement rate raises with respect to the Employment Development Department's approval, the Subcommittee is concerned that such a low placement rate will undermine public support for the program.

I am raising these concerns with you at this time because I believe they must be taken into consideration in monitoring the current plan and in reviewing plans which will be put forward for the 1984/85 program year. The Job Training Partnership Act gives the Governor authority to disapprove a job training plan which "does not comply with a particular provision or provisions of this Act or of regulations of the Secretary under this Act." Unless the states are willing to exercise the authority granted to them under the statute to assure compliance with the Act, the program will soon fall into chaos and disrepute. To prevent such a disasterous result from occurring, I am prepared to seek whatever legislative and other remedies are necessary to assure proper enforcement of the Act and to achieve an equitable and effective Federal job training program.

Sincerely,

Gus Hawkins

Augustus F. Hawkins
Chairman

AFH:smb

MEMBERS

DIANE WATSON
CHAIRPERSON

KEN MADDY
VICE CHAIRMAN

WILLIAM CAMPBELL
PAUL CARPENTER
DAN MCCORQUODALE
HENRY MELLO
JOSEPH MONTOYA
HERSCHEL ROSENTHAL
OLLIE SPERAW

California Legislature
Senate Committee
on
Health and Welfare

COMMITTEE ADDRESS
STATE CAPITOL
ROOM 4038
(916) 445-5965

CONSULTANTS
JIM LOTT
JANE UITTI
JEANNETTE BURTON
TED LASCHER

ROBIN VAN RIPER
COMMITTEE SECRETARY

RECEIVED
[illegible]

February 14, 1984

Honorable Augustus Hawkins
Chairman
House Subcommittee on Employment Opportunities
House Office Building
Washington, D.C. 20515

Dear Representative Hawkins:

As chairperson of the Health and Welfare Committee of the California Senate and as a senator from the Los Angeles area, I am submitting the attached comments on the Los Angeles County job training plan. I respectfully request that my comments be made part of the record for the hearing held by the House Subcommittee on Employment Opportunities on February 14, 1984, in Los Angeles, California.

In general, I would like to register my opposition to the manner in which federal job training funds are being used primarily for the county's General Relief recipients, to the possible exclusion of AFDC and other needy persons residing in the service delivery area. I believe the limited training resources should be concentrated on other segments of the low-income population who would benefit more from the training and hence provide a higher return on the county's investment than has been seen in the General Relief population. The guidelines embodied in Senator Lockyer's Family Economic Security Act establish, I believe, a better system of priorities for use of job training funds than the Los Angeles County plan.

Sincerely,

Diane E. Watson
DIANE E. WATSON
Chairperson

DEW:gil

Attachment

COMMENTS OF SENATOR DIANE E. WATSON
SUBMITTED TO THE HOUSE SUBCOMMITTEE ON EMPLOYMENT OPPORTUNITIES

February 14, 1984

Representative Hawkins and Members:

I appreciate the opportunity to present my comments for the record. You are to be commended, first, for your principal role in the enactment of the Job Training Partnership Act (JTPA) and second, for holding this hearing today. A program of employment training, developed in partnership with private industry, and focused on the economically disadvantaged, is of primary value and importance to California.

However, as you know from your experience in Congress, enactment of a law and implementation of it may be two very different matters. It appears that the job training plan under which the Los Angeles County Private Industry Council is operating does not meet the intent of JTPA. Los Angeles County apparently has abrogated its responsibilities of caring for indigents by using the job training program to avoid providing for the legitimate subsistence needs of its General Relief population. As reported in several articles in the local newspapers, the county expected to save four million dollars, NOT because recipients trained under the program would move off the assistance rolls, but because they would drop off aid rather than undergo training. This expected result, of course, has not materialized.

Concentrating these limited federal training dollars on the General Relief population in the county means that other equally

CONTINUED--

NEEDY GROUPS--NOTABLY YOUNG AFDC MOTHERS AND BLACK AND HISPANIC UNEMPLOYED YOUTH--WILL NOT HAVE AS MUCH ACCESS TO JOB TRAINING PROGRAMS AS THEY WILL HAVE OTHERWISE. I FEEL THAT CONGRESS AND THE TAXPAYER WILL REALIZE A BETTER RETURN ON THE JOB TRAINING DOLLAR IF THESE OTHER GROUPS ARE SERVED IN LARGER NUMBERS. FOR THE MOST PART, THESE OTHER GROUPS ARE MORE EMPLOYABLE AND JOB-READY THAN MANY OF THE GENERAL RELIEF RECIPIENTS. THE LIKELIHOOD, THEREFORE, THAT A JOB TRAINING PROGRAM WILL ENABLE THEM TO EVENTUALLY MOVE INTO SELF-SUFFICIENCY IS GREATER.

ALONG THESE LINES, I BELIEVE A BETTER INTEGRATION OF EMPLOYMENT AND TRAINING PROGRAMS AND PROGRAMS SERVING AFDC AND OTHER LOW-INCOME PERSONS IS CALLED FOR. CALIFORNIA HAS ALREADY ESTABLISHED A MECHANISM FOR DOING THIS IN SENATOR LOCKYER'S FAMILY ECONOMIC SECURITY ACT, WHICH WILL BE DESCRIBED IN OTHER TESTIMONY TODAY. IN THAT PIECE OF LEGISLATION, CERTAIN GROUPS ARE TARGETED FOR RECEIPT OF SERVICES IN ORDER OF THEIR LIKELIHOOD OF SUCCESS, WITH AFDC, NOT GENERAL RELIEF, RECIPIENTS FIRST. ALTHOUGH FESA WAS NOT FUNDED IN STATE BUDGET, THE APPROACH IN THAT LAW IS PREFERABLE TO THE LOS ANGELES COUNTY APPROACH.

IN CONCLUSION, I ENCOURAGE THE MEMBERS OF THIS SUBCOMMITTEE TO EXAMINE VERY CLOSELY THE PRIORITY FOR SERVICE ESTABLISHED IN THE LOS ANGELES PLAN, AND TO QUESTION WHETHER EVEN MORE SCARCE JOB TRAINING FUNDS SHOULD BE DIVERTED INTO A PROGRAM THAT NOT ONLY HAS NOT ACCOMPLISHED ITS OBJECTIVES THUS FAR, BUT WHICH ALSO IS QUESTIONABLE IN TERMS OF MEETING THE INTENT OF JTPA.

• • • • • • •

Jobs Watch

Testimony

on

Job Training Partnership Act
Targeting Problems

by

Morton H. Sklar
Project Director and Legal Counsel
Jobs Watch Project
Center for National Policy Review
Catholic University Law School
1751 N Street, N.W.
Washington, D.C. 20036

Before
The Employment Opportunities Subcommittee
House Education and Labor Committee

February 14, 1984

Editor
James S. Byrne
Legal Adviser
Morton H. Sklar
Staff Writer
Erica E. Tollett

1751 N St. N.W.
Washington, D.C.
20036
(202) 659-1062

Published by
the Center for
National Policy Review
Catholic University of
America
School of Law
Washington, D.C. 20064
(202) 832-8525

Director
William L. Taylor

Congressman Hawkins and Members of the Subcommittee:

My name is Morton Sklar. I direct and serve as legal counsel for the Jobs Watch project of the Center for National Policy Review of Catholic University Law School.

Jobs Watch is a public interest group that monitors the operation and impact of government programs and policies affecting the unemployed. We issue periodic publications dealing with some of the major issue areas related to joblessness.

A major focus of our current work is the transition from CETA to JTPA, and the role played by the Department of Labor in administering the new program. Copies of our three most recent JTPA Alerts, reviewing some of the significant developments and problems under JTPA's transition have been provided to your staff, and have been made available at these hearings.

Our Jobs Watch Alert of October 24, 1983 helped bring to light the problems involving JTPA allocations in Los Angeles County that are the focus for these hearings. We also have been providing back-up legal analysis and support to the attorneys from the Western Center on Poverty and Law who have been handling the case.

The purpose of our testimony is to provide:

1. A brief legal analysis of Los Angeles County's exclusionary policies;
2. A review of JTPA implementation problems arising in other localities that might provide some insight on the causes and treatment of the situation in Los Angeles County; and
3. An overview of how state and federal oversight efforts could be improved.

I. Legal Issues

Several important legal issues are raised by Los Angeles County's policy of restricting all (or, more recently, the bulk) of JTPA assistance to general relief recipients. This policy violates federal law in several critical ways.

A. Nondiscrimination. The large majority of general relief recipients are male. A very large proportion of those eligible to receive JTPA assistance, especially in the designated target group of AFDC recipients, is predominantly female. Restricting JTPA service to general relief recipients, thereby excluding the prepondorance of eligible women from participation, violates the nondiscrimination requirements of JTPA (Section 167).

Even in the absence of a specific intent to exclude protected groups, this nondiscrimination standard is violated if the inevitable effect or impact would be to deny a protected group their equal opportunity to receive assistance.

This type of unlawful exclusion would result if Los Angeles County's policy is allowed to continue.

Prohibitions against discrimination such as those incorporated in Title IX of the Education Act also may be violated, since a substantial amount of JTPA funds are normally earmarked to (or through) the public schools. If this is true in Los Angeles County, then Title IX would be applicable.

The federal government has a special responsibility to assure compliance with these nondiscrimination standards. In a notice published in the Federal Register of September 28, 1983, the Department of Labor

(DOL) gave notice that complaints raising discrimination issues could be filed directly with DOL, without having to exhaust local and state grievance procedures, as is normally true under JTPA.

The special importance attached to nondiscrimination requirements, and the continuing federal oversight responsibility in this area, provide added justification for these hearings, and for maintaining Congress' active interest in the handling of this case by Los Angeles County, by the State of California, and by DOL.

B. JTPA Targeting Requirements. Section 203(a)(3) of the JTPA statute specifies that recipients of AFDC assistance

> "shall be served on an equitable basis, taking into account their proportion of economically disadvantaged persons sixteen years of age or older in the population."

A policy that restricts JTPA assistance largely to general assistance recipients would be in clear violation of Congress' targeting requirement for AFDC participants.

The AFDC targeting requirement, one of the few specific earmarking provisions in JTPA, reflects Congress' strong desire to promote the transition of federal welfare recipients to unsubsidized employment. Los Angeles County's claim that they have a free hand in selecting among eligible beneficiary groups does not accurately reflect this purpose, nor the clear targeting language that Congress enacted for AFDC participants.

Los Angeles County's proposed plan also would undermine Congress' requirement that forty percent of JTPA funds be allocated for youth. Apparently, the County is claiming that this requirement can be met, at least partially, because a certain percentage of the general assistance population is from 18 to 24 years old. In fact, the percentage of general assistance recipients in this category is well below forty percent. More important, when Congress established this requirement, they clearly had more in mind than simply double counting existing JTPA recipients so as to satisfy youth targeting needs. Specific programs geared to youth needs were contemplated, but have not yet been made part of Los Angeles County's plan.

II. Targeting Problems in Other Jurisdictions

Experiences in several other jurisdictions that mirror Los Angeles County's targeting problems raise two critical questions of special importance to this committee:

1. Are the statutory standards in JTPA adequate to assure that the objective of equitable and effective service to those most in need will be met?
2. Are the mechanisms for monitoring and assuring compliance with statutory provisions adequate?

Although it is still too early in most jurisdictions to assess targeting results in a general way, the number and type of serious problems coming to light are disturbing.

In addition to Los Angeles Couty, Jobs Watch has been asked to assist groups alleging significant targeting violations in several other locations, including Houston, Texas, and the states of New Hampshire and Arizona.

In Houston, the Department of Labor has already made two formal findings that policies adopted by that city's private industry council (PIC) are in violation of both CETA (since the case arose prior to October 1, 1983) and JTPA. These policies would have excluded from participation in employment and training programs everyone who

--is a school dropout without a high school diploma or graduate equivalency degree; or

-- has previously participated in a training program.

Just in the past week, new complaints have come in from three separate sources of still another serious targeting problem in Houston -- the PIC's refusal to fund any programs targeted to youth other than one residency program for offenders that already is in operation. This policy would violate JTPA's forty percent youth targeting requirement.

In New Hampshire, counties are dropping from the county welfare rolls anyone who applies for or participates in JTPA, on the theory that they would thereby not be immediately available for full-time employment if it were offered.

This policy flies in the face of JTPA's purpose of helping welfare recipients become more employable and self-sufficient through training. It effectively precludes a major group of eligible beneficiaries from participating in JTPA. While this is occurring as a result of a welfare program policy, the administration of JTPA also is implicated, since New Hampshire, as operator of a state-wide SDA, is ultimately responsible for supervising JTPA operations, and should not be approving county plans that incorporate this policy or operate under it.

In Arizona, non-migrant farmworkers, despite facing massive layoffs because of floods and the new federal crop protection program, have been denied the right to participate in the Title III dislocated worker program. Current reports indicate that this unjust exclusion may be in the process of being revised, in response to the filing of formal complaints with the Governor. But the current (revised) state Title III standards still deny all but a small number of dislocated farmworkers the ability to receive Title III JTPA assistance.

Jobs Watch is about to begin a more thorough survey of JTPA targeting patterns across the nation, in order to determine whether or not the reported problems in Houston, New Hampshire, and elsewhere are indicative of more widespread exclusionary tendencies. Without this more comprehensive survey, it is not possible to make an objective judgment as to extent of JTPA targeting and impact problems. But the fact that the serious violations we have described have already come to light this early in the JTPA allocation process, suggests that considerably more attention needs to be paid to targeting issues.

The increasing frequency of reports of unlawful exclusions of major beneficiary groups, of the type taking place in Houston and Los Angeles County, is suggestive of a broad tendency to cream participants -- to select those easiest to serve, rather than those facing more serious obstacles to employment who need greater amounts of assistance for longer periods of time. Observers around the country uniformly report that SDAs are exhibiting a strong preference for short-term assistance projects that are geared to the fast turnover of participants, and to quick placements.

What is especially troubling is that the extensive creaming that is taking place seems to be linked to a perception tha JTPA itself requires it -- that JTPA's emphasis on numbers and immediate positive outcomes makes creaming and exclusions of harder to serve groups inevitable.

This is not consistent with what Congress had in mind when JTPA was passed. But unless additional actions are taken to promote effective services to the hardest to employ, and to support and encourage the value and need for more substantive training opportunities under JTPA, the problems in Houston and Los Angeles County are likely to be repeated in a variety of forms in numerous jurisdictions across the country.

III. Improving State and Federal Oversight

A major area requiring attention from Congress in order to help alleviate creaming and the exclusion of major beneficiary groups is how to assure that state and federal oversight and support responsibilities under JTPA are carried out more effectively than they are at present. The efforts of the Western Center on Poverty and Law to alert the State of California to the problems in Los Angeles County were met with a response that local service delivery areas have complete discretion to choose among eligible beneficiaries, and that the state consequently could not interfere. This is an incorrect reading of JTPA requirements that is unfortunately shared by many states. Most states have not established procedures or capacities to assure that local JTPA policies are consistent with their state plans, and with federal statutory requirements. Many states have not yet established, or made operational, grievance procedures that would provide a mechanism for handling complaints on local JTPA practices.

These deficiencies are mirrored at the federal level, where DOL's strict hands-off policy with respect to both oversight and support activities has fostered the perception that localities and states will not be held accountable for failure to comply with most statutory standards, particularly those related to targeting. DOL's handling, or more accurately its mishandling of proposed policy issuances in the areas of performance standards, youth employment competencies and auditing are just a few examples of recent federal oversight inadequacies that have set an unfortunate tone too often emulated at the state level.

The indications coming in from Los Angeles County, Houston, New Hampshire, Arizona and other jurisdictions strongly suggest that:

- Congress' targeting objectives are not being applied properly in many localities;
- The states and the federal Department of Labor have not been acting effectively to prevent, identify, and correct these violations; and
- Substantially more needs to be done at both state and federal levels to assure that Congress' statutory requirements and standards are fully and properly observed.

Thank you for this opportunity to present our views.

JobsWatchAlert

Job Training Partnership Act and Youth

Major JTPA Problems for Youth in Houston, Women in Los Angeles

Major problems are being reported in the administration of JTPA, suggesting that important target groups, especially youth, dropouts and women, are likely to be severely short changed.

In Houston, the Gulf Coast Legal Foundation recently brought three cases before the Department of Labor on policies that would exclude from training most applicants who are:

- School dropouts,
- Former participants in the CETA program, or
- In need of English language assistance.

Complaints had previously been filed with the city of Houston on these practices, pointing out their inconsistency with both CETA and JTPA targeting objectives, and their discriminatory impacts on black and Hispanic minorities who make up a sizable proportion of the dropout and non-English speaking populations.

Under JTPA, appeal to DOL would not ordinarily be available on complaints raised by actual or potential beneficiaries. But in this case, the policies originally were adopted before October 1, while CETA was still in effect. In addition, Houston did not act to resolve, or even conduct the requested hearings on the grievances within the 60 days required by the statute. Even under JTPA, a case may be appealed to DOL if the service delivery area does not act on a grievance within this statutory time limit.

DOL has accepted jurisdiction of the cases, and began an on-site investigation on October 17.

Even though these complaints are technically being treated as CETA cases, they have important connections to JTPA. The denial of service to school dropouts directly contravenes JTPA's mandate that dropouts be provided equitable service, proportional to their incidence in the economically disadvantaged population.

Houston officials claim to have softened their policy against the exclusion of former CETA participants. Their recently approved JTPA plan, instead of an outright exclusion, allows local officials to collect information on prior participation, and to use it "as part of enrollment criteria." But, as more than one Houston official has pointed out, this still means few if any prior CETA enrollees will be accepted in practice.

As to youth impact, Houston officials understand that they are bound by JTPA's mandate to serve dropouts. But the word "dropout" does not appear at any place in the narrative of Houston's JTPA plan, and dropouts are not listed among the groups specifically targeted for priority service. City officials argue that their omission of dropouts as a target group in the plan will not affect service delivery results. But this position does not take account of the impact that the plan's targeting provisions is intended to have on program planners and operators.

DOL is obliged under the statute to issue preliminary findings from its investigation of the Houston cases within 120 days from the date of the appeal, or by early February. In the meantime, efforts are continuing to correct the exclusionary policies when JTPA's implementing contracts come before the city council for approval.

In Los Angeles County's JTPA program, the group bearing the brunt of exclusionary policies is women. The County Board of Supervisors adopted a plan that drops "employables" from its general relief (local welfare) program, placing them instead in virtually all of the available JTPA adult training slots, which are limited to 4,000 full-time, or 9,000 half-time positions.

The Board justified its action by citing JTPA's emphasis on serving the welfare population. But this overlooks the fact that the JTPA statute mentions AFDC (federal

Jobs Watch Alert is a publication of the Jobs Watch Project of the Center for National Policy Review, Catholic University of America School of Law, 1751 N Street, N.W., Washington, D.C. 20036. Contact: Morton Sklar (202) 659-1062

Monday, October 24, 1983

welfare) recipients, not welfare recipients in general, as priority recipients, mandating that they (like dropouts) be served proportionatelly to their presence in the economically disadvantaged population. Moreover, the AFDC population is predominantly female, whereas 80% or more of general relief recipients are male, raising the possibility that JTPA's nondiscrimination provisions are being violated because of the unbalanced impact.

Critics, including the Western Center on Law and Poverty, contend that the county's switch from general relief to JTPA is really no more than a fund saving measure, since the county, in effect, will be substituting federal JTPA money for its own general relief outlays. They point out that under the JTPA program, even if an equivalent number of training positions were available, no stipends or support payments are provided, making it difficult, if not impossible, for many relief recipients to participate. What will really happen to these individuals, they suspect, is that they will be dropped from the roles as noncompliers, because JTPA is not a realistic alternative for them.

Young people also may be big losers under the proposed system. Most general relief recipients do not have children, unlike AFDC participants whose eligibility is based on the presence of children in the household. By denying JTPA training (and presumably increased job opportunities) to AFDC parents, these youngsters also will be hurt.

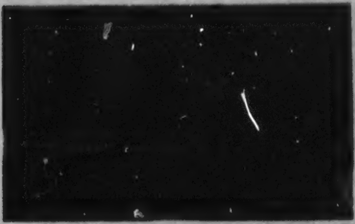
What is worrisome to many observers is the possibility that other jurisdictions will take a similar approach to that of L.A. County, by linking receipt of benefits under an assistance program with a one-shot placement in JTPA training. While the opportunity for training itself is not objectionable, problems are raised if the assistance payments are limited or cut off during or after participation in JTPA, or if the requirement is applied, as in L.A. County, not as a legitimate means to help recipients find jobs, but as a means to harass them off the benefit roles.

What we are seeing in both the Houston and Los Angeles County situations reflects a pervasive problem that seems to be developing under JTPA—a strong tendency towards "creaming." Creaming means directing assistance to those who are easiest and cheapest to serve, instead of devoting the additional time and resource that might be necessary to help those facing more serious barriers to employment. JTPA seems to reinforce the tendency to cream by its emphasis on quick placements, and the limits it places on time for participation and the amount of funds available to be allocated to support services and other related needs.

One dramatic indicator of the likely trend towards creaming under JTPA came to light at the October 19 National Conference on Employment convened by the Northeast Mid-West Congressional Coalition in Washington. One of the major national youth projects, frequently cited as a "model" for how Congress wanted JTPA funds to be used, noted that one of its state groups had decided against applying for JTPA funds because, as one staffer put it, "There is no way that we can reach at-risk and seriously disadvantaged youngsters given JTPA restrictions and its focus on fast placements."

Another element favoring creaming is the limited amount of overall funds available under JTPA, at a time when unemployment remains at very high levels, particularly for minorities and the economically disadvantaged. As Maggie Banks, director of Houston's PIC, put it, "Right now we have 10,000 people applying for assistance, and only 300 JTPA positions to offer them. Who do you think we are going to choose from that applicant group when they all meet the eligibility criteria? Isn't it going to be those most likely to be successfully placed in jobs at the end of their training, given the performance requirements imposed on us by DOL and the state? If we don't do it this way we are going to lose the contract."

Margaret Banks, Executive Director of Houston's Private Industry Council where exclusion of dropouts is being challenged



Congressman Hamilton Fish chairs youth panel at Northeast Mid-West employment conference

Jane Lee Eddy of the Taconic Foundation, at left, spoke for more attention to the at-risk youth under JTPA

Congressman Hamilton Fish, chairing a panel on youth at the Northeast Mid-West Congressional Coalition Meeting, made a similar observation. "With the level of funding presently provided by JTPA," he said, "we will just not reach a very large proportion of those youth needing this type of assistance."

Contact on the Houston case is Michelle Lord, Gulf Coast Legal Foundation (913)651-9080, and on the L.A. County situation is Carmen Estrada, Western Center on Law and Poverty (213)487-7211.

Jobs Watch will be trying to assemble information on these and other aspects of JTPA activities, particularly as they affect youth, in the coming weeks. Please keep us posted on developments and issues in your areas, so that we can keep others informed. **JWA**

New Youth Initiatives Provide Models for JTPA

Several new and impressive initiatives are getting underway in the youth training area. Some of them deserve to be considered as possible models or sources of information and assistance for the many local officials and private industry councils now facing the question of how best to allocate the substantial portion of Job Training Partnership Act funds that is earmarked for economically disadvantaged youth and for school dropouts.

National Urban League Plans Academies Programs

The National Urban League, supported by a first stage planning grant from the Edna McConnell Clark Foundation, has chosen three cities (Portland, Ore., Houston and Pittsburg) as possible sites for Academies Projects, aimed at developing specialized skill training opportunities for "at-risk" youngsters who are potential dropouts. During this initial planning phase, each of the three sites will seek to develop the long-term support and community involvement that will enable the projects to become a regular part of youth training operations.

The Academies (school within a school) concept, based on successful efforts in Philadelphia and Palo Alto, Calif., is built around a close collaboration between the business community and the schools that produces a jointly run training program to supplement regular high school activities and curricula. As early as the ninth or tenth grades, students are exposed to practical career training and work experience in fields where real job opportunities exist in the local labor market.

A unique element of the Academies approach is the substantial involvement and participation by private employers within the regular school context. Business people are expected to contribute financial help, curriculum planning, equipment, and course guidance, and to provide trainers and work opportunities for participants and graduates. Classroom training in basic skills and in modern business technology is matched with practical experiences at the work site.

The Urban League's initiation of these Academies projects demonstrates that community groups can play an important role in developing their communities' youth and JTPA programs. Instead of waiting for local private industry councils (PICs) and government officials, the League began the process of seeking out effective youth project models, and then worked to obtain the support and involvement of employers and the schools to make local implementation possible.

Given the fact that local community based organizations (CBOs) are being largely excluded from PICs, and from JTPA planning and administration more generally, the experience of the Urban League with its Academies projects provides an alternative approach that local groups in other communities might use to help direct local efforts in more effective directions for at-risk youth, and to obtain more attention from JTPA for worthwhile projects. (Contact Bill Price Curtis (202)393-4332.)

Chicago Alliance for a Collaborative Effort Maps JTPA Proposals

A similar CBO initiative, built around the need to find effective youth project uses for JTPA funds, is taking place in Chicago. Several community groups, including the Boys Clubs, United Way, Case Central (an Hispanic group) and the Urban League, convened a meeting of a broad cross-section of Chicago's business, government, educational and CBO sectors on July 20, with the goal of beginning a collaborative effort to identify and develop the best possible methods for allocating the youth portion of the city's JTPA funds. They invited representatives from nine "model" youth projects from around the country to give the group a "nuts and bolts" overview of the kinds of approaches that have worked best elsewhere. These presentations, and the discussions that followed, were used as a basis for the joint drafting of several proposed projects geared to Chicago's needs. The project proposals were submitted to the mayor (who was represented at the meeting) and to the local PIC, and the coalition is continuing active efforts to encourage them to adopt the projects as part of the city's JTPA program.

Among the youth program models that were used as guides for the group were the:

- Pre-employment training programs of 7,001 Ltd. (Contact Jeffrey Johnson (202)484-0103.)
- Washington Urban League Word Processing Training Center (Contact Alonza Evans (202)393-4332.)
- Henry Street (New York) Settlement Urban Life Development Program for High Risk Youth (Contact Lyle Gerts (212)473-1474.)
- Boston's Medical Health Care Training Program (Contact George Moriarity, Boston PIC (617)742-4550.)

Questions on the Chicago Coalition effort as a whole can be directed to Bruce Cole (312)947-9374 or Delbert Arsenault ((312) 648-1550.

School-to-Work-Action Programs (SWAP) Expand

SWAP Programs have been operating on a demonstration basis, with the support of the Edna McConnell Clark Foundation, in Albuquerque (the Career Guidance Institute), Boston, and Philadelphia. With additional support from the Clark Foundation, several new projects using the SWAP model are now being considered for such locations as Washington, D.C., and East St. Louis, Ill.

SWAP emphasizes in-school training for at-risk youngsters, using a variety of program elements that promote effective tie-ins between the school and business communities including:

- Orientation of teachers at business sites;
- Career day programs presented in the schools;
- Shadow days—field trips to work sites where students can observe and take part in real work experiences; and
- Summer and after school job placements.

Crucial to the SWAP approach is a strong collaboration between local employers and the schools, aimed at building the capacity of the schools to familiarize, train and motivate at-risk youngsters as part of their regular educational activities.

Representatives from all of the existing SWAP projects, and from the proposed new sites, will be meeting in Boston on October 26–28 to compare notes, and to consider how information on SWAP experiences and results can best be shared with other communities in the process of developing youth program options.

Inquiries from communities interested in the SWAP model should be addressed to Hattie Dorsey Harlow at the Edna McConnell Clark Foundation (212)986-7050.

Youth Project Networks Available for JTPA Needs

Two networks are now in place to help communities obtain the information and assistance they need to select and operate effective youth training projects appropriate to their needs. One, the **Youth Practitioners' Network**, has been organized by the Center for Human Resources at Brandeis University. The other, called the **Partnership Project**, is serviced by Martin and Rosi, a private group in Richmond, Va., that has been instrumental in starting innovative youth projects in several localities. Both groups have recently begun major new initiatives to broaden their networks and to stimulate development of model youth programs at several sites.

The Brandeis Center, supported by a grant from the Aetna Life and Casualty Foundation, has begun a national program in nine cities to encourage collaborative community efforts to train and employ disadvantaged youth. The goal in each of the cities (Washington, D.C., Milwaukee, Albuquerque, Dayton, Cincinnati, Des Moines, Hartford, Oakland, and Portland, Ore.) is to bring representatives of all the major sectors in the community (business, government, schools and CBOs) together for a cooperative effort to stimulate the development of a comprehensive system for serving the needs of at-risk youth, with a focus on education and employment.

The first planning meeting of representatives and organizers from all the project sites will be held in Boston on November 6–11.

Support and technical assistance will be provided by the Brandeis Center on a continuous basis for the two-year period of the program, as local coalitions take shape and youth projects begin to be implemented. As in the Chicago initiative (see item 2, above) and the SWAP projects, the collaborative framework is seen as the critical factor that will help produce effective projects and results.

The Aetna projects are part of a larger youth project network operated by the Brandeis Center called the **Youth Practitioners' Network**. The Network distributes ideas and data on youth project needs and results to a large number of groups and individuals involved with youth training issues throughout the country. It also serves as a source of technical assistance, inviting inquiries from communities seeking information on effective project approaches, or needing help on specific local problems. ***Jobs Watch*** readers are invited to join and use the Network. (Contact: Erik Butler or Andrew Hahn (617)647-2114).

The Partnership Project, funded by grants from the Edna McConnell Clark, Ford and Mott foundations, is in the process of starting 10 new youth employment projects, in addition to the eight already in operation. Existing sites are Richmond, Va.; Birmingham, Ala.; Blanding, Utah; Kansas City, Kans.; New York, N.Y.; Houston, Texas; San Antonio, Texas; and Greenville, S.C. Representatives of the existing and newly proposed sites met in St. Louis on October 10 and 11 to share information and ideas.

A collaborative effort between the business, education and government sectors is at the heart of the effort in all of the participating jurisdictions. Each project seeks to combine some form of in-school or after-school classroom skill training with work experience, although there are considerable differences (based on local needs and preferences) in various aspects of the projects.

Partnership Project members meet in St. Louis to welcome new sites

The Comprehensive Employment and Training Act (CETA) and now JTPA, are seen as important sources for support in most of the jurisdictions. But JTPA also has been the cause of serious problems. Marsha Hamm, project director for the Birmingham project (called Teen Opportunities Promote Success (TOPS), calls JTPA's youth performance standards "the most difficult problem we are dealing with" because job placements (which are emphasized) are not always the best measures of success for youngsters. She also is critical of the specific performance measures adopted by the Department of Labor, since they relate almost exclusively to dropouts, not to in-school youth, even though "at-risk" youngsters who are still enrolled are supposed to be a major beneficiary group.

Another critical problem that most of the Partnership Projects have experienced is the difficulty of getting sufficient on-the-job training positions and guaranteed jobs from area employers. Most sites report that employers end up feeling that participating young people can do the job and do contribute valuable work. But getting commitments from employers initially was hard, and will become even harder as training and job placement needs increase in number.

Lack of availability of incentive funds from JTPA to help cover costs is another critical problem as more projects get underway. Representatives from several sites doubted that enough funding was presently available under JTPA, despite its targeting to youth, to fill the need, especially in light of the absence of stipends, which often are essential to youngsters from families facing severe economic hardship.

The Partnerships Project also operates a Technical Assistance Network made up of key people who have played a major role in developing and implementing its youth programs around the country. These experienced individuals, along with project facilitators Ruby Martin and Frances Rosi, are available to communities that either would like to consider participation in the Partnership Project, or simply have specific questions on implementing their JTPA youth programs. Call (804)643-0301.

Competency Based Testing Systems

Another important element of the new youth initiatives relates to the competency based testing system that the JTPA statue mandates to be part of each locality's program efforts.

The U.S. Department of Labor recently was broadly criticized for its failure to adopt ***uniform guidelines*** on how the localities' testing systems should be developed, and what they should contain (see ***Jobs Watch JTPA/Youth Alert*** of May 12, 1983, page 5). Uniformity is desirable since the purpose of the testing system requirement in JTPA is not only to gauge the progress of individual trainees, but to evaluate the results of JTPA youth efforts as a whole. DOL's refusal to adopt a uniform system, and the detailed guidance to go with it, will hurt national evaluation efforts, since it will be difficult to compare and compile result data from different sites.

But even without a uniform framework, every locality still is required by the JTPA statute to develop and institute a competency-based testing system as part of its youth programs. The problem facing local officials and PICs is how to devise an appropriate and useful system suited to their own program choices. Fortunately, much of the more difficult legwork associated with this task has already been done.

The **Remediation and Training Institute**, headed by former director of DOL's Office of Youth Programs, Robert Taggart, is one group that provides comprehensive materials on existing testing systems. The Institute has organized a complete catalogue describing the components of the most effective youth competency testing systems presently available for a wide selection of skill areas. Called the Comprehensive Competencies Program, their review can provide communities with the one or two best available sets of instructional materials and testing packages most closely suited to their own training program needs.

Each instructional and testing package covers a variety of relevant academic and functional skill areas, and is keyed to several different levels of skill attainment.

Marsha Hamm, project director of Birmingham's TOPS Program

Copies of the program overview, as well as technical advice and assistance on problems associated with testing systems, can be obtained from Taggart or Barbara Dunn at the Institute (206 King Street, Alexandria, Va. 22314 (703)836-7030).

The **Brandeis Center for Human Resources** also has compiled a set of recommendations on competency testing and instructional materials for the use of its Network. Their suggestions and advice on the development of testing systems for JTPA purposes can be obtained from Andrew Hahn (617)647-2934.

Conclusion

Several valuable ideas seem to be emerging from some of the more promising youth training initiatives now getting underway.

1. **Use JTPA.** JTPA can provide a valuable framework, and a possible source of funding, for local efforts aimed at improving the employability of at-risk youth. Because JTPA targets 40% of local training funds to economically disadvantaged youth, and a "proportional" share of all funding to dropouts, communities face considerable pressure to develop and fund youth training projects. This mandate can be used as an effective basis for promoting new youth initiatives within the JTPA process.

2. **Seek Collaborative Efforts.** Collaboration between the key community groups (government, business, schools and CBOs) appears to be the one common and critical element in several of the most promising program approaches. It establishes a framework that helps produce workable ideas, at the same time that it provides community support, and helps to generate commitments for training and job placements from the business sector.

3. **Take the Initiative.** Although community groups are not faring well in the JTPA process, they do have some models (notably the Chicago and National Urban League Academies initiatives) suggesting alternative methods for helping to develop and mold a community's youth efforts under JTPA. Even without membership on the PICs, there are other effective methods for planning projects, and for generating broad community support behind them.

4. **Make Use of Effective Models.** Considerable work has been done to identify some of the more effective youth program approaches, as well as the training materials and testing systems to go with them. They provide a valuable source of ideas and models to help guide the youth program choices now being faced under JTPA.

5. **Use Youth Project Networks.** The Youth Practitioners' Network and the Partnership Project provide contacts and guidance to help local communities deal with particular local issues and needs associated with the development and operation of youth programs. **JWA**

JTPA Discrimination Complaint Procedures Issued by DOL

The Department of Labor has just issued (***Federal Register*** of September 28, 1983) new regulations on the handling of discrimination complaints arising under JTPA. Unlike other types of complaints, those alleging discrimination do not have to be reviewed first by the local jurisdictions where the problem occurred. They can go directly to DOL, with 120 days provided for completion of an investigation and the issuance of an initial determination of compliance or noncompliance.

Of special importance, the presence of a discrimination claim removes a complaint from the JTPA statutory restriction that applicants for assistance, or participants in the program, are unable to appeal local determinations to DOL.

If the Houston and Los Angeles County cases (reported above) are any indication, many local JTPA policies and practices are likely to involve some discriminatory impacts. Where this is true, direct complaints to DOL seem to be in order, since this is likely to be a far more effective option than the filing of local grievances with the same jurisdictions responsible for the alleged violations of JTPA requirements.

Please keep ***Jobs Watch*** posted on situations involving actual or possible complaints arising under JTPA.

JWA

JTPA and the Draft

Young people at or close to draft age have a special interest in the provision of JTPA prohibiting assistance to those who have not complied with the draft registration requirements of the Selective Service Act. Because the statutory language is very general, states and service delivery areas would seem to have considerable discretion as to whether only a conviction for draft evasion can trigger denial of assistance, or whether a simple, unprosecuted failure to register also would justify exclusion from the program. **San Mateo, Calif.**, for example, has opted for the conviction approach, while **Alameda, Calif.**, is seeking proof of registration from applicants, and plans to deny participation to non-registrants.

The **Center for Constitutional Rights** in New York is working with local lawyers considering a legal challenge to jurisdictions following the Alameda approach. They cite a Minnesota federal district court opinion that found a similar requirement tied to the receipt of education assistance benefits to be in violation of the 5th Amendment (self-incrimination) and bill of attainder (sanctions without due process) protections in the Constitution.

Groups or individuals having problems or questions with the application of the selective service compliance requirement in their jurisdictions should contact Ellen Yeroshefski or Frank Neal (212)768-5452. The Center also would appreciate reports from the various localities on how this provision is being interpreted and applied in different areas. **JWA**

Calendar of JTPA and Youth Meetings

October 26–28—U.S. Department of Labor's **Advisory Committee on Performance Standards** will be meeting to discuss the development of the standards for the first full year of JTPA at the Quality Inn on Capitol Hill in Washington, D.C. (Contact Hugh Davis (202) 376-6820.)

November 1—First full set of hearings on JTPA oversight by the **employment opportunities subcommittee of the House Education and Labor Committees**, 9:30 a.m. in Room 2261 or 2257 in the Rayburn House Office Building, Washington, D.C. Department of Labor officials will be the only ones to testify at this hearing. Other sessions will follow for additional witnesses. (Contact Beth Buehlmann (202) 225-7101.)

November 9-10—Second **National Association of Private Industry Councils** regional meeting on JTPA and youth in Denver. CBO and youth group participation welcomed. (Contact Lori Strumpf (202) 223-5640.)

December 4-7—**U.S. Conference on Mayors, National Governors Association, National Association of Counties**, and the **National Association of Private Industry Councils** will present their second JTPA progress report conference in Savannah, Ga., to exchange information pertaining to all aspects of JTPA. Among the featured topics are dislocated workers, youth programs, developments during the nine month transitional period prior to institution of sanctions, and delivery problems. (Contact Steve Kane (202) 293-7596.) **JWA**

JobsWatch Alert

Center for National Policy Review
Catholic University
Washington, D.C. 20064

Nonprofit Organization
U.S. Postage
Paid
Washington, D.C.
Permit No. 4066

Los Angeles Regional Coalition
of
Service Providers, Inc.
1400 West 9th Street, Room 101
Los Angeles, California 90015
(213) 386-1752

RECEIVED
MAR 1 3 1984
SUBCOMMITTEE ON EMPLOYMENT OPPORTUNITIES

DEAR DECISION MAKER:

I am pleased to enclose a copy of our SERVICE PROVIDERS STUDY which has just been completed. The purpose of the Study was to determine the attitudes of Service Providers after the first few months of the Job Training Partnership Act under Los Angeles County as a Service Delivery Area.

We hope that the Study will prove to be a valuable resource in the planning and implementation of the next program year under JTPA.

Sincerly,

Howard A. Boyle
HOWARD A. BOYLE
Chairman

Dear Susan:
Thanks so much for your interest in our local problems. This study was entirely a volunteer effort.
Sincerely,
Howard

"Creating Opportunities for Job Training and Employment"

LOS ANGELES REGIONAL COALITION
OF
SERVICE PROVIDERS, INC.

JOB TRAINING PARTNERSHIP ACT

SERVICE PROVIDER STUDY

INTRODUCTION

The Los Angeles Regional Coalition of Service Providers, Inc., is a non-governmental, voluntary organization comprised of public and private providers of employment and training services in the greater Los Angeles area. The majority of the members of the Coalition currently operate JTPA funded programs under contract with the County of Los Angeles. Not all providers, however, are active members of the Coalition.

At our December 1983 meeting it became increasingly evident that the real concerns of providers were not necessarily known. Although many agencies articulated problems, they sometimes seemed unique; the problems of one were not necessarily the problems of others. The 1984-86 planning process was well underway at the Department of Community Services and the strengths as well as the shortcomings of the current program had not been measured in any objective manner.

It was the opinion of the members that a survey should be developed which would hopefully provide a reliable measurement of service providers' attitudes toward certain major program aspects. Specifically:

- Program Planning
- Program Design
- Fiscal
- Evaluation Criteria

It was suggested that the actual survey consist of objective multiple choice questions followed by space for subjective comments.

A Subcommittee was selected by the Chairman of the Coalition to develop and distribute a questionnaire to each L. A. County service provider, tabulate the results and compile a report for distribution to the Board of Supervisors, PIC, DCS and interested service providers. The Subcommittee was comprised of:

Salvador R. Velasquez, Chairman	ESGV Consortium
Norma Campbell	ESGV Consortium
Dorothy Eldon	United Community Housing Development Corporation
Glenn Farrell	Hacienda La Puente USD
Cathy Haggerty	United Community Housing Development Corporation
Pamela Harris	Community Bilingual Home/Health Programs, Inc.
Dan Pezold	ESGV Consortium
Dan Robertson, Ph.D.	California State University L. A. Center in Mental Retardation

The population surveyed was taken from a listing obtained from the DCS entitled "Department of Community Services JTPA Agencies." The questionnaire was self-administered and distributed by direct mail. A total of fifty-seven (57) questionnaires were distributed. Each provider was asked to have a "...responsible and knowledgeable staff member..." complete the questionnaire and return it by February 1, 1984 in an enclosed envelope.

On February 3, 1984, subcommittee members attempted to call agencies who had not yet responded. The results of the calls fell generally into the following categories:

- * Did not recall receiving questionnaire
- * Lost and requested a duplicate
- * Promised to mail
- * Unable to contact

A deadline of February 10, 1984 was set after which questionnaires received were not counted in the final report. A total of thirty-five (35) questionnaires were received by this date representing 61% of the fifty-seven (57) service providers polled. Of those who did not respond, no significant patterns were identified. The geographic distribution of non-respondents was fairly uniform. Public and private sector providers appeared to be equally represented both among respondents and non-respondents. Responses were received from all but one of the Prime Agents.

Each questionnaire was coded with a number which assured anonymity to each respondent. Results were tabulated using the letter response for each multiple choice question. In the case of three respondents certain questions had multiple answers (e.g., circled both "adequate" and "marginal"). In such cases the more positive response was utilized (e.g., "adequate").

This report has been prepared with the desire to place additional objective and subjective data into the hands of decision-makers. It is our hope that with such data we may further develop our collective strengths and find ways to address our current shortcomings. All data collected (except for the identification of respondents) may be reviewed by interested parties. In order to do so please call Dan Pezold at (813) 960-3964. An appointment will be scheduled so you may make an on-site inspection of the materials.

SYNOPSIS OF SIGNIFICANT FINDINGS

There were a number of what the subcommittee considered to be significant findings. This portion of our report is a synopsis of those findings:

- A total of 94% of the respondents felt the 1983-84 JTPA program planning conducted by the Department of Community Services was less than adequate.
- A total of 71% of the respondents participated in the planning very little or not at all.
- A total of 69% had attended at least two of the three 1984-86 planning sessions indicating a strong desire to participate.
- Only 54% feel the current planning process is less than adequate which marks a distinct improvement over 1983-84. There is also 54% who feel they will have little to no effect on adopted program policies which seems to indicate that a review of the process may be in order.
- There were 66% who indicated that current cost per participant funding levels on long-term employment retention are marginal to poor.
- Respondents often felt that General Relief participants required longer training than the standard economically disadvantaged participant.
- There were 77% who felt at least an adequate possibility of attaining their Registration and Enrollment goals; only 63% were as confident concerning completion of training and only 49% for job placement.

* One half, or 50%, felt their ability to implement DCS's Grievance and Supportive Services Bulletin was marginal to very poor.

* Even though they will be reimbursed for a "placement," no two respondents shared the same overall understanding of what constituted a reimbursable placement. It was extremely evident that key contract language had not been satisfactorily defined as of February 10, 1984. This fact, coupled with respondents uncertainty concerning attainment of completion and placement goals should be an area of grave concern.

* A total of 57% felt that cash advances during start-up and training periods were critical or extreme.

* A total of 71% who are receiving GR stipend checks indicate the current process as it is being charged to their accounts is marginal to very poor.

* There were 66% who felt their agency could be evaluated to a marginal extent or not at all utilizing 1983-84 data through March 31, 1984. A total of 71% felt that 1984-86 funding evaluation criteria should be based from a moderate extent to fully on historical data.

OUR FINDINGS

The following represents the findings of our subcommittee. The cover letter which was enclosed in the package sent to each service provider is included. A copy of the actual questionnaire follows with a numerical total above each response with represents the total number of responses received in each category.

The questionnaire is followed by an analysis of the total objective responses obtained on each question. Following each analysis, representative subject comments taken directly from the questionnaires are included.

Next, individual totals are cited for questions 22 and 23. Finally, some comments received which were of a general nature are included.

January 20, 1984

Dear Service Provider:

The enclosed questionnaire has been developed by a Subcommittee of the Coalition of Service Providers. Planning for 1984-86 Los Angeles County JTPA programs is currently in progress. In order to gain maximum insight into both the best and least productive features of the current program, we ask that a responsible and knowledgeable staff member complete this questionnaire.

As you know, two factors are essential if we are to gain the knowledge which may help us better prepare for successful 1984-86 programs: frankness and full participation. In order to encourage this please be assured that individual questionnaires will not be identifiable by agency names nor will information disseminated be attributed to individual agencies. The questionnaire, however, has been identified by code number in order to allow for tracking of responses.

When completing the questionnaire, please consider each question carefully and select responses you believe are most representative of reality. In addition, we encourage your comments in the spaces provided.

Please assist us by returning the questionnaire in the enclosed envelope no later than February 1, 1984. We appreciate your participation and feel confident that all providers will derive benefit through such an exchange of information.

Sincerely,

Salvador R. Velasquez
Subcommittee Chairman
Coalition of Service Providers

Salvador R. Velasquez 1325 West Garvey North, West Covina, CA 91790 (213) 960-3964

INSTRUCTIONS: PLEASE CIRCLE THE SINGLE RESPONSE WHICH YOU FEEL BEST DESCRIBES:

PROGRAM PLANNING

1. The JTPA program planning conducted by the Los Angeles County Department of Community Services for FY 1983-84 (current year).

a. Excellent	(0)	b. Very good	(0)
c. Adequate	(2)	d. Marginal	(6)
e. Poor	(8)	f. Very Poor	(19)

Comments: ______________________________

2. The extent to which your agency participated with DCS staff during the FY 1983-84 (current year) planning.

a. Very often	(3)	b. As often as desired	(4)
c. As often as necessary	(1)	d. Occasionally	(2)
e. Very little	(8)	f. Not at all	(17)

Comments: ______________________________

3. The number of 1984-86 DCS planning sessions for service provides (Forum Subcommittee) a representative from your agency has attended.

a. Three or more	(14)	b. Two sessions	(10)
c. One session	(4)	d. None	(7)

Comments: ______________________________

4. The effect you believe your agency's input will have on 1984-86 adopted program policies.

a. Very strong effect	(1)	b. Strong effect	(6)
c. Moderate effect	(7)	d. Limited effect	(11)
e. Very limited effect	(8)	f. No effect	(2)

Comments: ______________________________

5. Your overall impression of the JTPA program planning process conducted by the Department of Community Services and PIC for 1984-86.

a. Excellent	(1)	b. Very good	(4)
c. Adequate	(6)	d. Marginal	(3)
e. Poor	(11)	f. Very poor	(4)

NO RESPONSE (3)

Comment:

PROGRAM DESIGN

6. The effect of current cost per participant funding levels on long term participant employment retention.

a. Excellent	(0)	b. Very good	(1)
c. Adequate	(4)	d. Marginal	(6)
e. Poor	(9)	f. Very poor	(8)

NO RESPONSE (6)

Comment:

7. The length of training you are currently able to provide the average General Relief participant.

a. More than sufficient	(1)	b. Sufficient	(6)
c. Barely sufficient	(3)	d. Insufficient	(9)
e. Very insufficient	(6)	f. N/A	(8)

Comment:

8. The length of training you are currently able to provide the average non-General Relief participant.

a. More than sufficient	(1)	b. Sufficient	(10)
c. Barely sufficient	(4)	d. Insufficient	(8)
e. Very insufficient	(0)	f. N/A	(9)

Comment:

9. Your probability of attaining 100% of the 4 major performance goals in your current contract.

Step 1 - Registration/Enrollment

a.	Excellent	(12)	b.	Very good	(10)
c.	Adequate	(5)	d.	Marginal	(5)
e.	Poor	(1)	f.	Very poor	(1)

NO RESPONSE (1)

Comment: ______________________________

____

Step 2 - Entered Training

a.	Excellent	(14)	b.	Very good	(7)
c.	Adequate	(6)	d.	Marginal	(4)
e.	Poor	(1)	f.	Very poor	(1)

NO RESPONSE (1)

Comment: ______________________________

____

Step 3 - Completion of Training

a.	Excellent	(8)	b.	Very good	(7)
c.	Adequate	(7)	d.	Marginal	(10)
e.	Poor	(2)	f.	Very poor	(0)

NO RESPONSE (1)

Comment: ______________________________

____

Step 4 - Placement + 30 days

a.	Excellent	(2)	b.	Very good	(8)
c.	Adequate	(7)	d.	Marginal	(6)
e.	Poor	(7)	f.	Very poor	(4)

NO RESPONSE (1)

Comment: ______________________________

____

10. The availability and effectiveness of DCS's supportive services to General Relief participants in your programs.

a. Excellent	(0)	b. Very good	(2)
c. Adequate	(4)	d. Marginal	(2)
e. Poor	(6)	f. Very poor	(10)
g. N/A	(9)		

NO RESPONSE (2)

Comments: ______________________________

11. The percentage of General Relief recipients referred to your agency to date who are employable.

a. 90 - 100%	(1)	b. 70 - 89%	(4)
c. 50 - 69%	(1)	d. 30 - 49%	(4)
e. 10 - 29%	(11)	f. Under 10%	(5)
g. N/A	(8)		

NO RESPONSE (1)

Comments: ______________________________

12. Your agency's ability to effectively implement the conditions and requirements of JTPA Bulletin #7 (Grievance and Supportive Service Procedures).

a. Excellent	(2)	b. Very good	(2)
c. Adequate	(11)	d. Marginal	(5)
e. Poor	(6)	f. Very poor	(6)

NO RESPONSE (3)

Comments: ______________________________

13. Your overall understanding of program definition (e.g., "completed training," "placement") contained in your current contract.

a. Excellent	(6)	b. Very good	(9)
c. Adequate	(8)	d. Marginal	(5)
e. Poor	(3)	f. Very poor	(4)

Comments: ______________________________

14. In each category please check each situation which you believe will contribute to a placement for which you will be paid:

A. TRAINING RELATED	a.	Training related - specific (e.g., Auto Mechanics - placed as auto mechanic) - 1 no response	18
	b.	Training related - general (e.g., Auto Mechanics - placed as maintenance helper/mechanic)	17
	c.	Non-training related	13
B. EMPLOYMENT RETENTION	a.	30 calendar days employment	18
	b.	30 consecutive calendar days employment	7
	c.	30 calendar days employment with one employer	8
	d.	30 calendar days employment with two or more employers	10
	e.	30 consecutive calendar days with one employer	11
	f.	30 consecutive calendar days with two or more employers	6
C. NUMBER OF HOURS PER WEEK	a.	Forty or more hours per week	16
	b.	Thirty-two or more hours per week	15
	c.	Thirty or more hours per week	12
	d.	Twenty or more hours per week	13
	e.	Less than 20 hours per week	6
D. DATE OF PLACEMENT AS RELATED TO TERM OF AGENCY CONTRACT	a.	Obtained anytime during the contract period	17
	b.	Obtained anytime during the contract period up to 30 days after the end of the contract	18
	c.	Obtained anytime during the contract period up to 60 days after the end of the contract	7
	d.	Obtained anytime during the contract period up to 90 days after the end of the contract	5
E. DATE OF PLACEMENT AS RELATED TO COMPLETION OF TRAINING	a.	Obtained during training	17
	b.	Obtained within 30 days of completion of training	25
	c.	Obtained within 60 days of completion of training	6
	d.	Obtained within 90 days of completion of training	7

FISCAL

15. The overall percentage of Los Angeles County JTPA contract funds you have earned to date (through 12/31/83).

a. 90 - 100% (0) b. 70 - 89% (2)
c. 50 - 69% (5) d. 30 - 49% (9)
e. 10 - 29% (11) f. Below 10% (5)

NO RESPONSE (3)

Comments: ______________________________

16. The overall percentage of contract funds you will most likely earn through your current Los Angeles County JTPA contract.

a. 90 - 100% (12) b. 70 - 89% (16)
c. 50 - 69% (3) d. 30 - 49% (1)
e. 10 - 29% (11) f. Below 10%

NO RESPONSE (3)

Comments: ______________________________

17. Your need for advance operating funds during start-up and training periods.

a. Critical (15) b. Extreme (5)
c. Important (7) d. Moderate (0)
e. Marginal (4) f. None (4)

Comments: ______________________________

18. Your understanding of the requiremets for reimbursement to your agency for achievement of each of the four performance phases of your contract.

a. Excellent (6) b. Very Good (10)
c. Adequate (7) d. Marginal (7)
e. Poor (2) f. Very Poor (2)

Comments: ______________________________

19. Your assessment of the current process by which GR payroll is charged to your account.

a. Excellent	(1)	b. Very Good	(1)
c. Adequate	(5)	d. Marginal	(2)
e. Poor	(4)	f. Very Poor	(11)
g. N/A	(10)		

NO RESPONSE (1)

Comments: ____

____

EVALUATION CRITERIA

20. To what extent do you feel your agency performance could be fully evaluated for 1984-86 funding utilizing current year's performance data as of March 1, 1984?

a. Fully	(0)	b. Major Extent	(3)
c. Moderate Extent	(7)	d. Marginal Extent	(13)
e. Not at All	(10)		

NO RESPONSE (2)

Comments: ____

____

21. To what extent to do you feel development of program performance evaluation criteria for 1984-86 should be based upon historical data prior to 1983-84 (current year)?

a. Fully	(5)	b. Major Extent	(13)
c. Moderate Extent	(7)	d. Marginal Extent	(2)
e. Not at All	(7)		

NO RESPONSE (1)

Comments: ____

____

22. Please give the number of participants which you had on board effective December 31, 1983.

Step 1 - Enrolled/Registered # of Participants ______

Step 2 - Entered Training # of Participants ______

Comments: ____

____

23. Please give the total number of participants through June 30, 1984, per your current contract that you must:

Enrolled/Registered ________ Step 1

Entered Training ________ Step 2

Comments: ____

____

1. A total of 33 respondents (94%) felt that the JTPA program planning for FY 1983-84 was less than adequate. Of these, 27 (77%) felt the planning was poor or very poor.

   "Target population selection and screening very inadequate, reactionary Department planning (e.g., initial vs. final definitions of "slots"), inadequacies in Department supportive services system, etc. etc."

   "Acceptable concept to serve GR's; however, poor planning and implementation."

   "Referral system, policies and procedures have been inadequate. Training agency input was not provided until after implementation."

2. A total of 25 respondents (71%) participated in the aforementioned planning very little or not at all. Of the 8 respondents (23%) who appeared to be participants in planning process for 1983-84, all appeared to be active participants in the 1984-86 process.

   "The staff offered no opportunity for this agency to participate in planning."

   "The agency was not informed nor invited to participate in any planning for 1983-84--only instructed."

   "DCS did not listen to the previous or present PIC and certainly did not consult service providers. Their response to DPSS and the Supervisors was a reaction rather than a 'plan'".

   "DCS staff was supportive, however, policies established by PIC were not communicated to DCS staff in a timely fashion."

3. At the time of distribution of the questionnaire 3 planning sessions for 1984-86 had been held. A total of 28 respondents (69%) had attended at least two sessions. Of those, 4 indicated they were notified late or not at all.

   "Notified too late."

   "I attended other related meetings (LARC, and PIC, planning PIC and oversight PIC). County sets policy at those meetings, off the cuff, without thorough thought.

4. A total of 19 respondents (54%) anticipate a limited to very limited impact on 1984-86 adopted program policies. A total of 14 respondents (40%), however, feel their input will have a moderate to very strong effect.

   "I feel our input will have a strong effect because I spoke to the Board of Supervisors as an individual and as part of Coalition groups and I've written letters, squawked, and attended meetings."

"Budgeting and administrative costs are factors the county takes into account. Program is third on the list."

"Strong effect through direct PIC involvement; however, no effect through service provider forum. Current representation inadequate."

"Input from our organization in concert with others with similar views have preliminarily resulted in a tentative plan acceptable and in concert with consensus of the planning subcommittee."

"Very limited due to DCS technical staff's lack of personnel and availability."

5. A total of 19 respondents (54%) feel the planning process for FY 1984-86 is less than adequate. Of those, 16 (49%) felt the process was poor or very poor. This does indicate a marked improvement in respondents' attitudes as compared to the FY 1983-84 process. There were a total of 11 respondents (31%) who indicated that the process was adequate. It is significant that of the 8 respondents who indicate they are not serving GR recipients this program year, 5 of them (63%) felt the FY 1984-86 planning was adequate.

"Although improved, the process of RFP creates a needless burden for agency staff."

"They were very self-serving!"

"The effort is limited by the confines of a (necessarily?) too tight time frame."

"A new experience--hopefully they are sincere."

6. A total of 23 respondents (66%) indicated that the current cost per participant funding levels on long-term employment retention are marginal to poor. Of those 17 employment retention are marginal to poor. Of those 17 (49%) felt it was poor or very poor. No responses were received indicating excellent; however, 5 (14%) felt it was either very good or adequate.

"The amount creates no comprehensive range of services to insure future employment, no incentive for GR participants to be goal oriented, provides only a minimal surviving budget."

"DCS never sent any bulletins for S. P. to be involved in the planning of the actual JTPA guidelines/amendments. We were told come October 1, 1983, you will serve the GR's with the JTPA program or you'll have no contract. As the agency that works directly with the people I think we should have been more involved."

"The unit values proposed by PIC and DCS are entirely too low for proper training."

A total of 15 respondents (43%) indicated that the length of training they are able to provide GR participants is either insufficient or very insufficient. There were 10 respondents (29%) that responded it was sufficient, although three of those indicated barely. A total of 8 indicated they did not serve GR's.

> "4-1/2 months to train and prepare long term unemployed, unskilled, ex-offenders is impossible."
>
> "Totally unrealistic."
>
> "Many GR clients are functional illiterates, can't read, write, follow instructions. Training into a job field will take longer than our 3 months."
>
> "GR's need more basic skill training and more emotional support in training than other participants."
>
> "For those selected for training by subcontractor, length of training is more than sufficient."
>
> "Low unit cost and improper screening prohibit quality training."

8. A total of 15 respondents (43%) indicate that the length of training they are able to provide non 'GR's is sufficient. Of those 4 respondents (11%) felt it was barely sufficient. Only 8 respondents (23%) felt it was insufficient. There were 9 respondents (26%) who indicated by their responses that they served all GR's. It appears that respondents felt that GR participants generally required greater (e.g., longer) training than non GR's.

> "Even those people who have worked, have been away from the work force for so long that they've forgotten many things, that's why they need extra time to return, not that they're stupid or lethargic or don't have the mentality or attitude for working."
>
> "Failure to provide proper support to non General Relief participants prohibit them from attending for any significant period."

9.1 A total of 27 respondents (77%) feel at least adequate probability of attaining their Registration goal. A total of 22 respondents (63%) see an excellent or very good probability. Only 7 respondents (20%) see a marginal to very poor probability. It is safe to say that most operating agencies are reasonably confident of attaining this goal. It should be noted that the level of attainment reported later in this questionnaire for Registrations and Enrollments does not necessarily reflect data upon which this attitude may be based.

9.2 A total of 27 respondents (77%) also feel they have at least adequate probability of attaining 100% of their current Enrollment goals. Only 6 respondents (17%) felt their chances would be marginal to very poor.

9.3 A total of 22 respondents (63%) believe they have at least adequate probability of attaining 100% of their completion goals. It is significant that only 15 respondents (42%) felt their chances were excellent or very good; compare this to 21 respondents (60%) who felt their probability to attain 100% enrollment goals was excellent or very good.

> "GR's don't want to drop out for fear of losing stipends."

> "Encountering too many difficulties with General Relief to adequately determine a completion."

9.4 Only 17 respondent (49%) feel they have an adequate probability of attaining 100% of their placement goals and of those 4 respondents (11%) do not serve GR participants. There were also 17 respondents (49%) who feel their probability is marginal to very poor. Of that group 11 respondents (31%) felt their probability was poor or very poor.

> "Placements are not necessarily training related."

> Lack of program planning--insufficient answers. 'What is placement?'"

> "Many don't want to work and are sickly."

> "The General Relief population, i.e., mono-lingual, are far more difficult to place than anticipated and/or promoted by DCS."

> "I think we can place some of our graduates. However, there is little chance that they would stay on jobs for 30 days or more."

10. A total of 18 respondents (51%) felt the availability and effectiveness of supportive services to GR participants was marginal to very poor. Of those 16 respondents (46%) felt it was either poor or very poor. None felt the services were excellent. Only 6 respondents (17%) felt they were either very good or adequate.

> "No support services have been secured to date. Requests have been submitted for clothing and transportation."

> "No one at DCS knows how or who can help the GR participant in this area."

> "Not aware of supportive services."

11. A total of 16 respondents, (46%) felt that under 30% of the GR participants referred to their agency were employable. This would appear to preclude their ability to earn contract funds which normally require a minimum "Placement" rate of 35%. There were 10 respondents (29%) Who felt between 30% and 89% were employable.

> "Some had drug problems or undetected medical problems."

> "Most are employable. They need their minds to be changed. They are able to function on a lower income."

12. A total of 17 respondents (50%) feel their ability to implement JTPA Bulletin #7 (Grievance and Supportive Services) is marginal to very poor. Of those 12 respondents (34%) feel their ability to implement the requirements are poor or very poor. There were 15 respondents (43%) who felt their ability was adequate to excellent. It should be noted that only 4 respondents (11%) felt their ability was either excellent or very good.

> "To implement is not the problem. Getting a response and follow-through is."
>
> "Clients will run over us. They know we can't impact on their stipend."
>
> "Too lengthy and time-consuming--makes agency responsible for all participants' problems."
>
> "Guidance procedures were received entirely too late for implementation."

13. A total of 27 respondents (66% feel that they have at least an adequate understanding of program definitions such as "completed training" and "placement" which are crucial to the agencies' performance payments. There were 12 respondents (34%) who felt their understanding was marginal to very poor. This second group commented most often.

> "The County can't define them, so how can the service providers."
>
> "No discussion of important criteria has occurred yet."

14. Respondents were asked to check each situation they believed would contribute to a placement for which they would be paid. The most striking result was the obvious confusion, even among the 6 respondents who previously indicated an excellent understanding of program definitions. None of the 6 had the same overall understanding. It appears that technical assistance in this area was extremely insufficient. Responses such as these also seem to indicate that it could be financially devastating to some operators should the County attempt to define "placement" at this late date in a restrictive manner. Previous responses show that providers are already concerned about goal attainment in this category. The current County "placement" requirements exceed federal guidelines for "entered unsubsidized employment."

15. A total of 16 respondents (46%) indicate they have earned at least 50% of their funds. An equal number had earned less than 50% as of December 31, 1984. Those in the second group often commented that they had late start-ups.

16. A total of 28 respondents (80%) feel they will earn at least 70% of their FY 1983-84 funds. Only 5 respondents (14%) feel they will earn 50% or less. Two factors should be considered. Can the 14% survive if they only earn 50% or less? How many of the 28 respondents feel they will earn 70% of more because that amount will be primarily earned through Registration and Enrollment, not through attainment of Completion and/or Placement goals?

    "Completion and Placements will be problems."

17. A total of 20 respondents (57%) felt that cash advances during start-up and training periods were critical or extreme. Only 8 respondents (23%) felt their need was marginal to none.

    "We aren't a bank!"

    "We must have funding in advance."

    "To start up with little or no monies put agencies in a position of borrowing or laying off staff temporarily which leads to additional costs and delays."

18. This question was utilized primarily as a control question to question number 13. The variation between the total in each category was very slight which appears to indicate consistency in the manner in which respondents answered questions.

19. A total of 17 respondents (49%) felt the manner in which GR payroll was charged to their account was marginal to very poor. This represents 71% of those who indicate they are receiving GR stipend checks. Of those, 15 respondents (43%) felt it was either poor or very poor. Only 7 respondents (20%) felt it was excellent to adequate.

    "Blind Faith"

    "DCS currently unable to define its recording process to training agency. Many areas still undefined."

    "Subcontractor should maintain control of fund distribution."

    "We don't feel that we should be charged until after enrollment and only through training completion."

    "There are problems that have never been addressed and never will be."

20. A total of 23 respondents (66%) felt that their agency could be evaluated only to marginal extent or not at all utilizing current year's performance. A total of 10 respondents (29%) felt the data could be used from a major to moderate extent.

    "Due to the fact that funding was very late."

    "How can they evaluate program when we didn't receive any money until January 1984. When we had to scream for referrals because "they didn't know who to send."

21. A total of 25 respondents (71%) felt that 1984-86 performance evaluation criteria should be based fully or to a moderate extent on historical data. Only 9 respondents (26%) felt it should be marginal or not at all. Data was not available to determine if those 9 had previous contracts by which they could be evaluated.

"We have an excellent history."

	QUESTION 22	QUESTION 23
1.	39/23	77/70
2.	NR	NR
3.	21/21	60/54
4.	15/15	45/22
5.	0/0	35/32
6.	21/21	NR
7.	NR/16	NR
8.	NR	NR
9.	11/11	25/23
10.	90/90	NR NR
11.	36/-	37/34
12.	58/57	244/-
13.	26/26	52/52
14.	48/48	84/76
15.	0/0	NR
16.	7/NR	102/NR
17.	0/0	503/273
18.	65/60	25/25
19.	25/25	44/44
20.	24/24	57/55
21.	140/140	119/119
22.	231/231	515/464
23.	18/18	34/31
24.	63/60	243/243
25.	0/0	10/9
26.	NR	NR
27.	10/-	35/32
28.	86/83	146/131
29.	100/100	552/491
30.	NR	86/77
31.	0/0	22/20
32.	18/14	41/36
33.	138/135	687/622
34.	20/16	40/40
35.	96/96	145/115

GENERAL COMMENTS:

"Will the PIC be given evaluation data on the DCS--run programs in the same format and with the same definitions as the CBO--run programs?"

"Recommendation: DCS needs an organizational chart which lists the aspects of the program with a person responsible and their phone number for accountability and straight answers."

CONCLUSION

As with any task of this type numerous factors can affect the outcome and its overall reliability. Those factors include too large a study group, insufficient response, biased and/or ambiguous questions, less than candid responses and lack of participation by one or more significant groups.

* SIZE OF STUDY GROUP The entire universe to be studied was under sixty providers which made our task relatively simple as compared to measuring attitudes of the general population. Our 61% response, we believe, lends toward rather significant reliability of our results.

* INSUFFICIENT RESPONSE Rarely is 61% return achieved on a self-administered, mailed questionnaire. Our results exceeded original goals of 50% response.

* BIASED AND/OR AMBIGUOUS QUESTIONS Under ideal conditions, a truly independent body would perform the tasks undertaken by our subcommittee. Recognizing this, every effort was made to provide the opportunity for receipt of unbiased and objective answers. Each question had a range which normally allowed for three "positive range" and three "negative range" responses. The questions were reviewed and edited on a number of occasions in an attempt to be unambiguous as well as unbiased.

  Had sufficient time been available it may have been advisable to "test" the questions on a sample group. The continuing 1984-86 planning process seemed to preclude this possibility.

  We believe our questions were generally unbiased and did not receive any comments concerning perceptions of such. Although we did not receive comments concerning ambiguity, three questions could have fallen into that category: seven, eight and fourteen.

  On questions seven and eight it is possible, in our opinion, that some respondents who answered in the positive range may have been doing so because they are "able" to provide sufficient lengths of training. The fact that they are able has little to do with the fact that they are not currently funded to be able to do so.

  Question fourteen, in our opinion, probably is not ambiguous. We believe that a high level of confusion exists primarily due to minimal availability of reliable technical assistance. Often, that which is received, conflicts from provider to provider. Because of the extremely wide-range of responses, however, it must be noted in this section.

- LESS THAN CANDID RESPONSES In order to assist in this area we took a number of steps. First, we requested candor in our cover letter. Secondly, we assured each respondent anonymity. Finally, we built in a test question (question 18 to test 13) and received very similar responses indicating rather high reliability.

- LACK OF PARTICIPATION BY ONE OR MORE SIGNIFICANT GROUPS Among the non-respondents were found both public and private for profit service providers in approximately the same mix as respondents. No geographic groupings appeared evident. Prime Agents were extremely well represented. Agencies serving youth were represented among both respondents and non-respondents.

It is our belief that due to the aforementioned, the results of this survey may be considered a rather reliable indication of the attitudes of Los Angeles County JTPA service providers as of February 10, 1984. Of even greater significance, it is the only comprehensive information available to date.

We recommend that the significant findings outlined in this study be reviewed and decision-makers consider appropriate action where it is indicated. Examples of such action might be:

- Develop and implement a cash advance system whereby agencies would receive funds by the first day of each new program year.

- Develop a task force to review current fixed rate performance reimbursement requirements in order to ascertain the feasibility of operators achieving them. In addition, review whether these goals exceed County goals, and/or past performance, particularly with GR's.

- Provide increased opportunities for direct input by service providers in JTPA planning including Titles II-B and III.

- Survey SDA's in the greater Los Angeles area to obtain information on how service providers are reimbursed, the average length of training, average cost per participant and general program design.
- Review the process by which General Relief stipends are currently being "charged" to providers' accounts and make revisions where they are indicated.

If this leads to even a few of the previously mentioned activities, or similar ones, it will have been worth the time and effort. We hope that our effort to gain information of this type will not be an isolated event. The insight gained from such an exercise hopefully will lead to reduced speculation concerning our present providers' attitudes on a number of subjects.

LOS ANGELES REGIONAL COALITION OF SERVICE PROVIDERS 9/14/84

QUESTIONNAIRE SENT TO SERVICE PROVIDERS REGARDING L.A. COUNTY JTPA PROGRAM

NOTE: HAND WRITTEN NUMERALS INDICATE NUMBER OF RESPONSES

PROGRAM PLANNING

INSTRUCTIONS: PLEASE CIRCLE THE SINGLE RESPONSE WHICH YOU FEEL BEST DESCRIBES:

1. The JTPA program planning conducted by the Los Angeles County Department of Community Services for FY 1983-84 (current year).

   a. Excellent 0 b. Very good 0 c. Adequate 2

   d. Marginal 6 e. Poor 8 f. Very poor 19

   Comments:

2. The extent to which your agency participated with DCS staff during the FY 1983-84 (current year) planning.

   a. Very often 3 b. As often as desired 4 c. As often as necessary 1

   d. Occasionally 2 e. Very little 8 f. Not at all 17

   Comments:

3. The number of 1984-86 DCS planning sessions for service providers (Forum Subcommittee) a representative from your agency has attended.

   a. Three or more 14 b. Two sessions 10 c. One session 4 d. None 7

   Comments:

4. The effect you believe your agency's input will have on 1984-86 adopted program policies.

   a. Very strong effect 1 b. Strong effect 6 c. Moderate effect 7

   d. Limited effect 11 e. Very limited effect 8 f. No effect 2

   Comments:

PLEASE CONTINUE TO CIRCLE THE SINGLE RESPONSE WHICH YOU FEEL BEST DESCRIBES:

5. Your overall impression of the JTPA program planning process conducted by the Department of Community Services and the PIC for 1984-86.

a. Excellent 1　b. Very good 4　c. Adequate 6

d. Marginal 3　e. Poor 11　f. Very poor 4　3 NO RESPONSE

Comments: ____________________

____

____

PROGRAM DESIGN

6. The effect of current cost per participant funding levels on long term participant employment retention.

a. Excellent 0　b. Very good 1　c. Adequate 4

d. Marginal 6　e. Poor 9　f. Very poor 8　6 NO RESPONSE

Comments: ____________________

____

____

7. The length of training you are currently able to provide the average General Relief participant.

a. More than sufficient 1　b. Sufficient 6　c. Barely sufficient 3

d. Insufficient 9　e. Very insufficient 6　f. N/A 8

Comments: ____________________

____

____

8. The length of training you are currently able to provide the average non-General Relief participant.

a. More than sufficient 1　b. Sufficient 10　c. Barely sufficient 4

d. Insufficient 8　e. Very insufficient 0　f. N/A 9

Comments: ____________________

____

____

PLEASE CONTINUE TO CIRCLE THE SINGLE RESPONSE WHICH YOU FEEL BEST DESCRIBES:

9. Your probability of attaining 100% of the 4 major performance goals in your current contract.

Step 1 - Registration/Enrollment

a. Excellent 12	b. Very good 10	c. Adequate 5	
d. Marginal 5	e. Poor 1	f. Very poor 1	1 No Response

Comments: ____________________

____

____

Step 2 - Entered Training

a. Excellent 14	b. Very good 7	c. Adequate 6	
d. Marginal 4	e. Poor 1	f. Very poor 1	1 No Response

Comments: ____________________

____

____

Step 3 - Completion of Training

a. Excellent 8	b. Very good 7	c. Adequate 7	
d. Marginal 10	e. Poor 2	f. Very poor 0	1 No Response

Comments: ____________________

____

____

Step 4 - Placement + 30 days

a. Excellent 2	b. Very good 8	c. Adequate 7	
d. Marginal 6	e. Poor 7	f. Very poor 4	1 No Response

Comments: ____________________

____

____

PLEASE CONTINUE TO CIRCLE THE SINGLE RESPONSE WHICH YOU FEEL BEST DESCRIBES:

10. The availability and effectiveness of DCS's supportive services to General Relief participants in your programs.

a. Excellent 0   b. Very good 2   c. Adequate 4
d. Marginal 2   e. Poor 6   f. Very poor 10   g. N/A 9   2 NO RESPONSE

Comments: ______________________________

11. The percentage of General Relief recipients referred to your agency to date who are employable.

a. 90-100% 1   b. 70-89% 4   c. 50-69% 1
d. 30-49% 4   e. 10-29% 11   f. Under 10% 5   g. N/A 8   1 NO RESPONSE

Comments: ______________________________

12. Your agency's ability to effectively implement the conditions and requirements of JTPA Bulletin #7 (Grievance and Supportive Service Procedures).

a. Excellent 2   b. Very good 2   c. Adequate 11
d. Marginal 5   e. Poor 6   f. Very poor 6   3 NO RESPONSE

Comments: ______________________________

13. Your overall understanding of program definitions (e.g., "completed training," "placement") contained in your current contract.

a. Excellent 6   b. Very good 9   c. Adequate 8
d. Marginal 5   e. Poor 3   f. Very poor 4

Comments: ______________________________

14. In each category please check each situation which you believe will contribute to a placement for which you will be paid:

A.
RAINING
:ELATED

a. Training related - specific (e.g., Auto Mechanics - placed as auto mechanic) 18
b. Training related - general (e.g., Auto Mechanics - placed as maintenance helper/mechanic) 17
c. Non-training related 15

1 no resp.

B.
MPLOYMENT
ETENTION

a. 30 calendar days employment 12
b. 30 consecutive calendar days employment 7
c. 30 calendar days employment with one employer 8
d. 30 calendar days employment with two or more employers 10
e. 30 consecutive calendar days with one employer 11
f. 30 consecutive calendar days with two or more employers 6

.C.
UMBER OF
OURS
ER WEEK

a. Forty or more hours per week 16
b. Thirty-two or more hours per week 15
c. Thirty or more hours per week 12
d. Twenty or more hours per week 13
e. Less than 20 hours per week 6

D.
ATE OF
LACEMENT
S RELATED
O TERM
F AGENCY
ONTRACT

a. Obtained anytime during the contract period 17
b. Obtained anytime during the contract period up to 30 days after the end of the contract 18
c. Obtained anytime during the contract period up to 60 days after the end of the contract 7
d. Obtained anytime during the contract period up to 90 days after the end of the contract 5

E.
ATE OF
LACEMENT
S RELATED
O COMPLE-
ION OF
RAINING

a. Obtained during training 17
b. Obtained within 30 days of completion of training 25
c. Obtained within 60 days of completion of training 6
d. Obtained within 90 days of completion of training 7

FISCAL

INSTRUCTIONS: PLEASE SELECT THE SINGLE RESPONSE WHICH YOU FEEL BEST DESCRIBES:

15. The overall percentage of Los Angeles County JTPA contract funds you have earned to date (through 12/31/83).

0	2	5	
a. 90-100%	b. 70-89%	c. 50-69%	
9	11	5	
d. 30-49%	e. 10-29%	f. below 10%	3 no response

Comments: ____________________

____

____

16. The overall percentage of contract funds you will most likely earn through your current Los Angeles County JTPA contract.

12	16	3	
a. 90-100%	b. 70-89%	c. 50-69%	
0	1	1	
d. 30-49%	e. 10-29%	f. below 10%	2 no response

Comments: ____________________

____

____

17. Your need for advance operating funds during start-up and training periods.

15	5	7
a. Critical	b. Extreme	c. Important
0	4	4
d. Moderate	e. Marginal	f. None

Comments: ____________________

____

____

18. Your understanding of the requirements for reimbursement to your agency for achievement of each of the four performance phases of your contract.

6	10	7
a. Excellent	b. Very good	c. Adequate
7	1	2
d. Marginal	e. Poor	f. Very poor

Comments: ____________________

____

____

PLEASE CONTINUE TO CIRCLE THE SINGLE RESPONSE WHICH YOU FEEL BEST DESCRIBES:

19. Your assessment of the current process by which GR payroll is charged to your account.

a. Excellent 1   b. Very good 1   c. Adequate 5

d. Marginal 2   e. Poor 4   f. Very poor N   g. N/A 10   1 No response

Comments: ______

______

______

EVALUATION CRITERIA

20. To what extent do you feel your agency performance could be fully evaluated for 1984-86 funding utilizing current year's performance data as of March 1, 1984?

a. Fully 8   b. Major extent 3   c. Moderate extent 9

d. Marginal extent 13   e. Not at all 10   2 No response

Comments: ______

______

______

21. To what extent do you feel development of program performance evaluation criteria for 1984-86 should be based upon historical data prior to 1983-84 (current year)?

a. Fully 5   b. Major extent 13   c. Moderate extent 7

d. Marginal extent —   e. Not at all 7   1 No response

Comments: ______

______

______

22. Please give the number of participants which you had on board effective December 31, 1983.

Step 1 - Enrolled/Registered   # of participants ______

Step 2 - Entered Training   # of participants ______

Comments: ______

______

______

23. Please give the total number of participants through June 30, 1984, per your current contract that you must:

Enrolled/Registered ________ Step 1

Entered Training ________ Step 2

Comments: ____

CITY OF SANTA MONICA
SOCIAL SERVICES COMMISSION

CITY HALL, 1685 MAIN STREET, SANTA MONICA, CALIFORNIA 90401-3295

December 20, 1983

The Honorable Deane Dana
Los Angeles County Board of Supervisors
822 Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

Dear Supervisor Dana:

This letter is written to express our deep concern over the implications of funding allocations for fiscal year 1983-84 for the Job Training Partnership Act as it will affect Supervisorial District 4 and more specifically, our community.

We are a seven member advisory commission, appointed by the City Council of Santa Monica, to advise them regarding social service issues, and to make funding and policy recommendations. Throughout the past year, we have met with over 50 agencies providing social services to our community in an effort to determine just which social service needs and problems should be given priority in allocating diminishing resources in this area. Unemployment, particularly among low-income, minority youth, was probably the most frequently cited social problem mentioned by human service agencies and other "community knowledgeables". It is for this reason that we find the County's recent funding allocations for JTPA, which will result in the virtual elimination of service to Santa Monica adult residents, to be of great concern. Clearly, unemployed adult residents of our community will find it very difficult, if not possible, to access programs as far away as Redondo Beach or the Crenshaw area. Programs such as JTPA that allow recipients of social services to become self sufficient, productive citizens have our full support. We feel that the citizens of our community should not be denied the opportunity to participate in such programs.

In addition, we feel it to be inequitable to make the services of JTPA available to General Relief recipients, while denying them to those receiving benefits through the Aid to Families with Dependent Children program. Recipients of AFDC are generally single parent mothers, who are likely to be badly in need of work to support their families. If the current policies of targeting all services to General Relief recipients continue, we fear that women and parents who are desperately in need to services will be discriminated against, as General Relief recipients are most often single males.

We ask that you consider these concerns in assessing the employment and training needs of the various communities under your jurisdiction and that the needs of our low income residents will be carefully considered as the Board of Supervisors makes difficult, but very important, funding decisions in the future.

Very truly yours,

MANUEL HELLERMAN, Chairman
for the Social Services Commission

cc: Pete Schabarum, First District
Kenneth Hahn, Second District
✓Edmund D. Edelman, Third District
Michael D. Antonovich, Fifth District
Berwyn H. Fraqner
Jack Gescheider
Jan Charles Gray
Rod D. Hanks
Carl A. Herman
Arthur Hirsberg
John Mack
Stephen Okayama
John D. Randall
Douglas L. Shaw
Ed Tanaka
Robert L. Varner
Melinda Wilson
Robert Allison
Paul Bluto
Carol Boots
John S. Calderas
Richard Chavez
Samuel P. Duberville

D CHINESE RESTAURANTS ASSOCIATION, 1400 S. Goodrich Blvd., City of Commerce, CA 90040, (213) 727-6400/01

January 11, 1984

Honorable Edmund D. Edelman
L.A. County 3rd District Supervisor
500 W. Temple St., Rm. 821
Los Angeles, CA 90012

Dear Supervisor Edelman:

I am writing this letter to you with a saddened heart. After working with the County Community Services Dept. (CSD) on the JTPA program over the last few months, I have come to the conclusion that this program, as it is currently being administered by the CSD, cannot be an effective program.

Over the last decade, through continuing support from your office and great efforts from our community, we were able to become a top notch job training and placement agency serving the needs of a special client group: disadvantaged Asians, especially those who have recently arrived in the U.S.

Because of the new service criteria and participant selection procedures imposed by the CSD for JTPA FY '84 we've had to modify our agency's existing structure and completely revise our training and method of operation. Even after we've executed these modifications to suit the needs of the GR clients forced upon us by the CSD, we still find that our past experience and areas of expertise to be insufficient, and/or incongruent, with the demands we face. This is because many of the GR clients come with severe personal, attitudinal, medical, drug and alcohol problems which require social services, medical attention or therapy, not job training.

We understand and support CSD's desire to help GR clients become self-sustaining citizens, which is why we have been serving them instead of the Asian clients whom we've been serving in the past. In the process of training and helping these GR clients, however, we've had to deal with some very serious problems, some of which have caused great financial losses to our agency:

1) Deterioration in our quality of training. It has been very difficult for us to conduct regularly scheduled classes on a consistent basis becasue attendance is so eratic. Many clients come to our school only on days that their GR checks are being distributed. Some have shown up under the influence of alcohol or drugs, and we've had to call in the sheriff to remove them from our premises. Among those who do attend classes some show blatant disrespect to the instructor and seldom obey any rules and regulations imposed by us. The frus-

tration of having to deal with these trainees has already caused one of our instructors to resign.

2) Security problems. In addition to frequent petty thefts here we have been the victums of two burglaries within the last two months resulting in a total loss of over $21,000. UCRA has been training disadvantaged individuals for the last 10 years and has been at the Goodrich location since 1981. There has never been any security problems until this fiscal year. We are not accusing any particular individuals or groups, however, we do want to point out that the first burglary took place on the first weekend after the commencement of training and the second one took place on the weekend immediately following the replacement of the stolen properties (1 IBM Memory Writer typewriter and 2 IBM Selectric II typewriters).

It is nearly impossible for us to operate the JTPA program under current CSD guidelines and budgetary restraints. Before this fiscal year there were agencies which spent up to $7,000 to train and place an individual, now we are asked to do the same plus motivate and provide counseling to these clients for one fifth of the cost.

The massive dumping of GR recipients on agencies like ours is a gross injustice and an ill-devised tactic aimed at reducing the County's burden that simply will not work. It took many years of hard work to establish the rapport and positive relations with the private sector companies which hire our graduates. With the drastic change in our program and the deterioration in the quality of our trainees, we fear that what've we've built up with the private sector will be seriously jeopardized, ultimately causing a negative impact upon our performance.

More importantly, the current JTPA totally ignores a greater needy population - persons who are on AFDC, new immigrants in need of marketable skills and persons who qualify for GR but failed to apply, refugees from abroad and other economically disadvantaged persons. By turning our backs to these people, we are jeopardizing their chances of becoming successful and contributing citizens here. Like the GR recipients, they are also an intergral part of our society.

We know that you've always been concerned with the welfare of our community. As an agency we have learned much from the challenges of this program. We write to keep you informed and will continue to do so in the months ahead. We are making headway in this program, even though it has proven to be a painful process.

Sincerely,

Chih Hsing Pei

Chih Hsing Pei
Executive Director

MOTION BY SUPERVISOR EDMUND D. EDELMAN

Since the beginning of the County's Jobs Training Partnership Act (JTPA) program, I have been concerned with this Board's policy related to the administration and operation of the program, and the General Relief (GR) recipients and other groups. Eligible unemployed women and minorities are being excluded because we use most of the adult training slots for the General Relief recipients. I realize the General Relief client needs help, but nevertheless we cannot continue to turn our back on the other eligible people who need this program to enter the labor market. I believe the Private Industry Council (PIC) shares my concern and intends to recommend that next year's program refocus priorities and strictly limit the number of slots reserved for GR's. However, I do not want to wait until next year. I want to resolve this issue now.

I have developed a series of recommendations that will begin to immediately free JTPA slots for training of non-GR recipients. My plan will also simultaneously reduce the scope of the remaining GR-Employment Program in preparation for the 1984-86 program. My plan can be implemented with a minimum of disruption to clients, contractors and involved County departments. I urge support of my plan and

I, THEREFORE MOVE THAT THIS BOARD:

(1) Instruct the Director of the Department of Community Services effective immediately and through June 30, 1984 fill all present and future JTPA vacancies with non-GR eligibles without causing any fiscal impact to service providers.

(2) Instruct the Director of DCS to insure that the new clients enrolled fairly represent women, minorities,

MOTION

(More)

Schabarum

handicapped persons, and other significant segments of the unemployed population.

(3) Instruct the Department of Community Services to suspend as quickly as administratively feasible intake of GR eligible persons into the JTPA Program following the 1982-83 guidelines as an approved plan for the 1984-86 JTPA-GR Program has been developed by the Private Industry Council and this Board.

In conclusion, I want to ensure that the participants who have cooperated during this past year with the County are not penalized, and that we all work together for the establishment of a program we can be proud of.

. . .

CJM
12684

Introduced—
no second
1/24/84

MINUTES OF THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

Larry J. Monteith, Executive Officer
Clerk of the Board of Supervisors
383 Hall of Administration
Los Angeles, California 90012

Chief Administrative Officer
Director of Community Services
Director of Department of
  Public Social Services

At its meeting held January 10, 1984, the Board took the following action:

81
The following matter was called up:

> Chief Administrative Officer's attached report and recommendations regarding County Employment and Training Program.

On motion of Supervisor Edelman, seconded by Supervisor Dana, unanimously carried, the matter was continued two weeks to January 24, 1984. The Chief Administrative Officer was instructed to report on the cause of over-expenditure of funds in the General Relief Program.

Copies distributed:
  Each Supervisor

CHIEF ADMINISTRATIVE OFFICER
COUNTY OF LOS ANGELES
713 HALL OF ADMINISTRATION / LOS ANGELES, CALIFORNIA 90012
974-1101

January 6, 1984

HARRY L. HUFFORD
CHIEF ADMINISTRATIVE OFFICER

MEMBERS OF THE BOARD

DEANE DANA
CHAIRMAN

PETER F. SCHABARUM
KENNETH HAHN
EDMUND D. EDELMAN
MICHAEL D. ANTONOVICH

EXECUTIVE SUMMARY

SUBJECT: COUNTY EMPLOYMENT AND TRAINING PROGRAM

Background

-- December 6, 1983, on motion of Supervisor Edelman, CAO, DCS to explore feasibility of using portion of projected savings in County program for non-welfare recipients.

-- Board approved program during 1983-84 Budget Deliberations, based on 1982-83 pilot program.

Conclusions

-- County program is viable and appropriate.

-- Resources are available for training non-General Relief participants.

-- Current number of participants in County Employment and Training Program and AFDC exceeds budgeted caseload.

-- Anticipate overexpenditure, not savings.

-- Have taken action to cease intake from DPSS to allow effective implementation of program by DCS.

Recommendation

-- CAO present appropriation adjustment necessary to continue County Employment and Training Program and finance AFDC program.

HLH:GAR
TS:alc
3a

CHIEF ADMINISTRATIVE OFFICER
COUNTY OF LOS ANGELES
713 HALL OF ADMINISTRATION / LOS ANGELES, CALIFORNIA 90012
974-1101

HARRY L. HUFFORD
CHIEF ADMINISTRATIVE OFFICER

January 6, 1984

MEMBERS OF THE BOARD
DEANE DANA
CHAIRMAN
PETER F. SCHABARUM
KENNETH HAHN
EDMUND D. EDELMAN
MICHAEL D. ANTONOVICH

HONORABLE BOARD OF SUPERVISORS
County of Los Angeles
383 Hall of Administration

Gentlemen:

COUNTY EMPLOYMENT AND TRAINING PROGRAM

On December 6, 1983, on motion of Supervisor Edelman, the Chief Administrative Officer and the Director of Community Services were instructed to explore the feasibility of using a portion of the projected savings from the County's Employment and Training Program to provide services to non-welfare recipients in all supervisorial districts where present allocations provide that only welfare recipients can presently be served under the adult program. In addition, we were to develop an equitable funding plan for all supervisorial districts based upon the projected savings.

DELAYED RECOVERY IN WELFARE CASELOADS

Participation in General Relief and the County Employment and Training Program has significantly exceeded the budgeted workload. This has more than offset the fiscal benefit realized by using Job Training Partnership Act funds in the County Employment and Training Program. Therefore, no "savings" are available to reallocate to non-welfare recipients.

At the same time, we are experiencing a less-than-anticipated impact from the improving economy on our Aid to Families With Dependent Children (AFDC) caseloads. Since these programs represent a mandatory charge on the County, it will be necessary to process an appropriation adjustment in the near future to finance projected expenditures.

COUNTY EMPLOYMENT AND TRAINING PROGRAM

On October 6, 1983, the Board approved the recommendations of the Department of Community Services regarding the utilization of Job

Training Partnership Act funds to provide job training services under Title II and services to displaced workers under Title III. This was consistent with the action taken during the 1983-84 Budget Deliberations, during which the Board set aside General Fund monies to be used for the adult stipend portion of the program.

The County's Employment and Training Program is targeted toward all General Relief applicants who are determined employable by the Department of Public Social Services. This decision was based on a successful pilot program in 1982-83 in which the Department of Community Services offered employment and training opportunities to approximately 1,800 General Relief (GR) and State AFDC-U welfare recipients.

The attached program statement includes the following: a) Program Summary; b) Program Benefits; c) Program Goals; d) Targeted Population; and e) Training for Non-General Relief Participants.

The goals of the program and the reasons for targeting the employable portion of the General Relief caseload remain valid. The General Relief recipients are among those most in need of assistance in becoming employable. Resources are available to provide training and employment services to non-GR adults, youth, displaced workers and other economically disadvantaged segments of our population.

The County program is consistent with the stated objectives of the Job Training Partnership Act and the State's Family Economic Security Act. Our Plan provides training/employment resources for every significant segment group targeted for services in the federal law.

Unanticipated Caseload Increase

Initially, we projected that implementation of the program would save the County $4.0 million based in part on the fact that Job Training Partnership Act (JTPA) funds could be used for some of the participant stipends. While the County has been able to mitigate General Fund expenditures by using JTPA monies in the County Employment and Training Program, the present number of participants substantially exceeds the budgeted number.

While the budget assumed an average caseload of 4,700 per month, in December the caseload reached approximately 15,000 participants. This is attributable to:

-- The initial transfer of approved cases from DPSS was underestimated.

-- The assumptions of the impact of the economic recovery on the caseload have not materialized, despite overall improving economic conditions.

-- Partially as a result of the higher caseload, delays were encountered in discontinuing participants who failed to cooperate with program requirements.

The caseload is expected to decline in future months reflecting the implementation of discontinuance and fair hearing procedures and improving economic conditions.

APPROPRIATION SHORTFALL

-- County Employment and Training Program

Due to the higher than expected caseload, funds are presently being expended at a rate that will result in the budgeted funds being exhausted by the end of January. An appropriation adjustment will be necessary to continue the program. Discontinuance of the program is not recommended as this could result in an overrun in the General Relief budget.

-- Aid to Families With Dependent Children

With the anticipated upturn in the State's economy, we projected decreasing caseloads during 1983-84. The caseload trend has not shown the expected downturn, and is currently running approximately 4.4% above our estimates. Due to the size of this caseload, even a slight variation will result in a substantial overexpenditure by year's end. However, since most of the projected aid payments are offset by Federal and State revenues, only a limited amount of County matching funds will be required. However, it will be necessary to appropriate additional funds to adequately cover this mandated program.

We are continuing our analysis of these projected shortfalls. Prior to the Board meeting of January 10, we will provide the Board with a separate memorandum that identifies the size of the estimated overexpenditures and the recommended sources of financing these mandatory costs. We plan to follow this with an appropriation adjustment necessary to adequately finance the requirements in the Specialized Career Rehabilitation/Employment and the AFDC budget units.

THEREFORE, IT IS RECOMMENDED THAT THE BOARD:

Instruct the Chief Administrative Office to prepare and submit for Board consideration an appropriation adjustment that will provide the necessary funds to continue the County Employment and Training Program and adequately finance the AFDC program for the remainder of fiscal year 1983-84.

Very truly yours,

Harry L. Hufford
HARRY L. HUFFORD
Chief Administrative Officer

HLH:GAR
TS:fb
38:s
Attachments

cc: County Counsel
Department of Community Services
Department of Public Social Services
Private Industry Council

Attachment 1

COUNTY EMPLOYMENT AND TRAINING PROGRAM

Program Summary

The County's employment and training program for former welfare recipients operates in the following manner:

- -- Department of Public Social Services determines whether an applicant would be eligible for General Relief (GR) subsidies and is employable. Instead of providing the person with a GR grant, the person is referred to the County Employment and Training program operated by the Department of Community Services.
- -- Department of Community Services carries out an assessment and provides the person with one or more of the following services, as appropriate: 1) job placement; 2) targeted job search; 3) vocational classroom training; 4) work experience; 5) remedial education or English As a Second Language (ESL) training; 6) specific skills training, and 7) referral to appropriate support services available in the community to facilitate work training.
- -- Department of Community Services provides each participant in the program with a maintenance stipend, funds for transportation, and vouchers to meet emergency needs as necessary.

Program Benefits

During 1982-83, the Department of Community Services, with Chief Administrative Office, Private Industry Council and Board approval, and in cooperation with the Department of Public Social Services, developed and implemented a pilot program to offer employment and training opportunities available under the Comprehensive Employment and Training Act program to approximately eighteen hundred (1,800) General Relief and State AFDC-U welfare recipients. This demonstration effort achieved positive results, both in terms of improving the employability of the participants and in achieving a financial benefit to the County.

Based upon the success of this effort, the Department of Community Services proposed that the program be expanded for 1983-84 to provide employment and training opportunities to all persons receiving General Relief as of October 1, 1983 and all eligible employable persons applying for General Relief during the program period. This proposal was approved by the Chief Administrative Office and by your Board during 1983-84 Budget Deliberations. There are a number of benefits to be obtained from such an effort:

- -- Achievement of economic self-sufficiency for individuals who would otherwise be dependent upon welfare subsidies.

- -- Increase services to targeted groups, such as youth;
- -- Improvement of the general economic outlook of the County as former welfare recipients become taxpayers, consumers and contributers to local productivity.
- -- By utilizing a portion of the allocated Job Training Partnership Act funds, the County has avoided the expenditure of County General Funds that would have otherwise been spent for public assistance.

The benefits of this program for the participants are obvious. This is the only opportunity many will ever have to break the cycle of welfare dependency and achieve economic self-sufficiency. The benefits to the public, while not as obvious, are important. As these persons who would otherwise be on welfare obtain employment, they infuse their personal and financial resources into the economy.

The County Employment and Training Program for General Relief referrals was developed for four (4) major reasons:

- -- Because the ability to get and retain a job is a major factor in the definition of self-worth in our society;
- -- Because General Relief recipients are among those most in need of assistance in becoming employable;
- -- Because welfare is a drain on the productivity and solvency of our economy, in addition to the sense of failure it can create in able bodied individuals; and
- -- Because such a program can mitigate County welfare costs.

Program Goals

The performance goals of the County of Los Angeles are to:

- -- Provide employment and job training opportunities to eligible residents;
- -- Reduce the number of persons receiving AFDC, State or local public assistance;
- -- Reduce the number of persons unemployed;
- -- Enable participants to acquire employable skills;
- -- Train participants in those occupations that are responsive to current labor market and economic conditions;

- -- Provide the necessary related support services necessary to keep a participant in the program;
- -- Increase involvement of the private sector through participation in the development of the County's employment and training programs;
- -- Better coordinate and develop linkages with those agencies providing related services to ensure that programs are coordinated and non-duplicative.
- -- Reduce educational deficiencies;
- -- Assist participants in obtaining permanent unsubsidized employment.

Specifically, by providing appropriate employment and training services to the target client population, the County will be enhancing their employability, their marketable skills, and therefore, their potential for higher wages. In addition, participants will receive employment services which include job development, job placement and job retention skills.

By the end of the 1983-84 program, the Department of Community Services expects to have placed a large number of persons in unsubsidized employment. These persons would have had the potential of remaining on welfare.

Targeted Population

In the Job Training Partnership Act Interim Plan, the County indicated that it, ..."plans to serve targeted welfare recipients, specifically General Relief (GR), Aid to Families With Dependent Children-Unemployed (AFDC-U), Aid to Families With Dependent Children-Family Group (AFDC-FG), youth (ages 16-21), and other JTPA eligible individuals during this nine-month interim program. The targeted welfare client population, all of whom are unemployed, will make up a large portion of the client population to be served."

The County developed this program as part of an extensive effort to develop self-sufficiency among welfare recipients, reduce welfare dependency, and lower County, State, and Federal welfare costs. As the County prepares for the upcoming Family Economic Security Act, it will be able to draw upon this experience to provide a comprehensive system for integrating the existing welfare system with available training and employment services.

The County's approach is consistent with the Job Training Partnership Act and the State's Family Economic Security Act.

Section 141 of JTPA states that, "...each job training plan shall provide employment and training opportunities to those who can benefit from, and who are most in need of, such opportunities and shall make efforts to provide equitable services among substantial segments of the eligible population."

In defining the eligibility requirements for services, the Family Economic Security Act includes, "persons who are receiving or would, in the absence of services provided under this division, qualify in the county of application for benefits under that county's general assistance program...."

The former General Relief recipients, and those participants who would have been eligible to General Relief without this training and employment resource, represent every significant segment group targeted for services under JTPA. These include women, veterans, the handicapped, and each of the age and ethnic categories.

As indicated in the State Employment Development Department (EDD) review of the County JTPA Plan, "Neither JTPA nor FESA prohibit an SDA Plan from targeting its employment and training opportunities for an identified segment of the eligible population, so long as youth, recipients of Aid to Families with Dependent Children and school drop-outs are properly served. It is concluded that this Plan contains provisions to satisfy the employment and financing services to the groups identified in JTPA."

Training for Non-General Relief Participants

As indicated on Attachment II, 87.3% of the total funding available for training and employment services in the Los Angeles County geographic area (including all 8 Service Delivery Areas) is directed toward non-General Relief participants. Within Los Angeles County's own SDA allocation for Title II JTPA funds, approximately 58% is available to groups other than former General Relief recipients. The 58% is made up of 44% of the JTPA funds set aside for youth and 14% available for services to adults who are not General Relief referrals. Federal law requires that at least 40% of the JTPA funds be used for the training of youth.

In addition to Title IIA which provides program funding for economically disadvantaged adults and youth, JTPA includes Title IIB - Summer Youth Employment and Training Program and Title III - Employment and Training Assistance for Dislocated Workers.

fb/38:d

COUNTY-WIDE ESTIMATED SDA ALLOCATION OF JTPA FUNDS BY SUPERVISORIAL DISTRICT

(In Millions of Dollars)

JTPA Funds	1		2		3		4		5		Total	
	Amt.	%	Amt.	%	Amt.	%	Amt.	%	Amt.	%	Amt.	%
Available for GR	$1.2	20.0	$ 1.0	8.1	$1.1	15.1	$0.7	12.7	$ 0.5	11.9	$ 4.5	12.7
Available for Non-GR	4.8	80.0	11.4	91.9	6.2	84.9	4.8	87.3	3.7	88.1	30.9	87.3
Total*	$6.0		$12.4		$7.3		$5.5		$ 4.2		$35.4	

*Includes the following Services Delivery Areas (SDA's)

- -- County of Los Angeles
- -- Los Angeles City
- -- Long Beach
- -- Torrance
- -- Verdugo
- -- Foothill
- -- Southeast L.A. Consortium
- -- Southbay SDA Consortium

See Attachment III for details.

TS:dmm
30:s
1/4/84

ESTIMATED SDA ALLOCATION BY SUPERVISORIAL DISTRICT

SERVICE DELIVERY AREA	DISTRICT I	DISTRICT II	DISTRICT III	DISTRICT IV	DISTRICT V	TOTAL IIA	% YOUTH	% ADULT
County of Los Angeles*	5,285,554	2,130,612	2,330,327	1,677,420	1,303,252	12,727,073	44	56
Los Angeles City	-0-	9,599,904	4,971,379	867,134	1,714,269	17,142,686	39	61
Long Beach ***	-0-	-0-	-0-	1,196,505	-0-	1,196,505	38	62
Torrance***	-0-	253,891	-0-	323,134	-0-	577,025	45.5	54.5
Verdugo***	-0-	-0-	-0-	-0-	702,230	702,230	28	72
Foothill***	322,650	-0-	-0-	-0-	549,376	872,026	37.5	62.5
Southeast L.A. Consortium***	370,549	-0-	-0-	511,711	-0-	882,260	39	61
Southbay SDA Consortium***	-0-	391,684	-0-	913,929	-0-	1,305,613	37	63
TOTALS	5,978,753	12,375,991	7,301,706	5,479,921	4,269,127	35,405,490		

*Includes overall DCS administration to bring total up to Title IIA Allocation.

** Estimate based on AFDC by Supervisorial District

***Estimates based on unemployment by Supervisorial District.

11/17/83:mjz

1983-84 JOB TRAINING PARTNERSHIP ACT

(In Millions of Dollars)

1983-84 Budget	Total Appropriation	GR Referrals	Other Participants	DCS/ Admin
Title IIA				
Adult (56%)	7.1	4.5	1.5	1.1
Youth (44%)	5.6	--	4.8	0.8
Subtotal	12.7	4.5	6.3	1.9
Title III**				
Dislocated Workers	0.6	--	0.5	0.1
Total	13.3	4.5	6.8	2.0
Supplemental Approp.				
Title IIA				
Older Workers*	0.5	--	0.4	0.1
Title III**				
Dislocated Workers	2.4	--	1.9	0.5
Total Supplemental	2.9	--	2.3	0.6
Grand Total	16.2	4.5	9.1	2.6

* Program to assist 140 Older Workers

** Does not include $1.5 million in cash and in-lieu match from employers. Total Dislocated Worker Plan to assist 1,480 workers

fb38:d

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor
EMPLOYMENT DEVELOPMENT DEPARTMENT (916) 445-9212
800 Capitol Mall, Sacramento, CA 95814

December 5, 1983
53:86:ccr

RECEIVED
JAN 23 1983
SUBCOMMITTEE ON
EMPLOYMENT OPPORTUNITIES

Carmen A. Estrada, Esq.
Western Center on Law & Poverty, Inc.
3535 West Sixth Street
Los Angeles, California 90020

Dear Ms. Estrada:

DECLARATION OF FINDINGS FOR COMPLAINT
AGAINST LOS ANGELES COUNTY SDA

Pursuant to the provisions of section 15029 of the Unemployment Insurance Code, enclosed is a copy of the Declaration of Findings issued on the above-referenced complaint. The Declaration of Findings is the result of a complaint you filed with me on October 6, 1983.

The findings conclude that the issues you raised in your complaint do not violate the provisions of the Job Training Partnership Act or the Family Economic Security Act. However, this department is monitoring the Los Angeles County Service Delivery Area to insure that its operations and administration achieve the intent of the program which is to provide training and employment to eligible participants, which include youth, recipients of aid to families with dependent children and school dropouts.

If the operation and administration of the program are not achieving this intent and corrective action is not taken by the service delivery area, its job training plan may be subject to revocation. The service delivery area may also be responsible for repayment of funds that are not expended in accordance with the acts.

I wish to thank you for the interest you have shown in this employment and training program. In addition, as the department's monitoring activities continue, I solicit information from your organization which may enhance our monitoring efforts.

Sincerely,

Original signed by
K. R. KIDDOO
Director

Enclosure

cc: Mike Antonovich
Berwyn N. Fragner
William Huston
Theodore Bruinsma

Complainant: Western Center on Law and Poverty

Service Delivery Area: Los Angeles County

Background:

This declaration of findings relates to the Los Angeles County service delivery area plan for the period October 1, 1983 through June 30, 1984. This declaration of findings is the result of a complaint made by the Western Center on Law and Poverty on October 6, 1983. This declaration of findings is made pursuant to the provisions of section 15029 of the Unemployment Insurance Code.

Issues:

The issues raised by the complainant are as follows:

1. That the service delivery area plan was not developed and approved in accordance with the requirements of the Job Training Partnership Act (hereinafter JTPA) and/or the Family Economic Security Act (hereinafter FESA).
2. That the service delivery area plan improperly "targets" the general relief population for training services.

Findings:

PLAN DEVELOPMENT AND APPROVAL

The service delivery area plan was developed by the County of Los Angeles. The private industry council for the service delivery area (hereinafter SDA) was certified by the Governor on August 1, 1983. Notice of the private industry council (hereinafter PIC) meeting on August 11, 1983 and copy of preliminary agenda was mailed to interested parties on August 8, 1983. The PIC met on August 11, 1983 and gave its concurrence to the plan. Notice that the service delivery area plan (hereinafter Plan) was available for review was published in seven local newspapers on August 12, 13, and 14, 1983.

The Los Angeles County Board of Supervisors reviewed and concurred in the Plan on August 16, 1983. The Plan was forwarded to the Employment Development Department on August 24, 1983. The PIC and the County Board of Supervisors approved their agreement on September 6, 1983 and September 20, 1983, respectively.

The Plan was approved on September 27, 1983.

Chapter 537, Statutes of 1983 was signed by the Governor on July 28, 1983. That statute contained an urgency clause and was intended to implement JTPA. Section 15045 was added to the Unemployment Insurance Code to require a public hearing by the PIC on the proposed Plan with at least 30 days advance notice and a 30-day comment period prior to final adoption of the Plan.

JTPA required that interm plans be submitted by August 31, 1983. The Plan for the Los Angeles County SDA was submitted timely.

Therefore, it is concluded that the Plan was developed, submitted and approved in accordance with JTPA. Strict compliance with section 15045 of the UI Code was not possible due to the time limitations required by JTPA.

PLAN TARGET GROUP

The program narrative for the Los Angeles County SDA Plan provides, at page 1, as follows:

> "Potentially Eligible Population
>
> "Los Angeles County plans to serve targeted welfare recipients, specifically General Relief (GR), Aid to Families With Dependent Children-Unemployed (AFDC-U), Aid to Families With Dependent Children-Family Group (AFDC-FG), youth (ages 16-21), and other JTPA eligible individuals during this nine-month interim program. The targeted welfare client population, all of whom are unemployed, will make up a large portion of the client population to be served."

Section 141 of JTPA (29 USC 1551) provides, in part, as follows:

> "Except as otherwise provided, the following conditions are applicable to all programs under this Act: (a) Each job training plan shall provide employment and training opportunities to those who can benefit from, and who are most in need of, such opportunities and shall make efforts to provide equitable services among substantial segments of the eligible population."

* * *

Neither JTPA nor FESA prohibit an SDA Plan from targeting its employment and training opportunities for an identified segment of the eligible population, so long as youth, recipients of Aid to Families With Dependent Children and school drop-outs are properly served.

It is concluded that this Plan contains provisions to satisfy the employment and training services to the groups identified in JTPA.

Dated: November 29, 1983

Original signed by

K. R. KIDDOO
Director
Employment Development Department

cc: State Job Training
Coordinating Council
T. Brunsma, Chairman

45337

JTPA
Interim Plan
and
Subgrant Agreement
October '83 through June '84

(1) REGISTRATION NO. 830.2587

(2) MODIFICATION NO. ______

(3) NAME OF SDA: COUNTY OF LOS ANGELES

UBGRANTOR
tate of California
mployment Development Department
tate Job Training Partnership Office
0 Capitol Mall, MIC 77
acramento, CA 95814

(4) SUBGRANTEE (SDA Grant Recipient)
Michael D. Antonovich, Chairman
Honorable Board of Supervisors
County of Los Angeles
383 Hall of Administration
500 West Temple Street
Los Angeles, California 90012

5) This Subgrant Agreement is entered into by the State of California, Employment Development Department (EDD) an the COUNTY OF LOS ANGELES, hereinafter the Subgrantee. The Subgrantee agrees to operate a program in accordance with the provisions of this cost reimbursement type Subgrant under the Job Training Partnership Act (JTPA). This X Subgrant ____ Modification consists of this sheet and those of t following as designated with an "X", which are attached hereto and by this reference made a part hereof:

X General Provisions, Exhibit A, 8 pages;
X Standards of Conduct, Exhibit B, 1 pages;
X Program Narrative, Exhibit C, 37 pages;
X Participant Program Plan, Exhibit D, 2 pages;
X Budget Plan, Exhibit E, 1 pages;
X Private Industry Council and Chief Elected Official(s) Concurrence and Administration and Planning Agreement(s)
Exhibit F, 1 pages;
X Joint Powers Agreement(s), Exhibit G, 5 pages.

6) FUNDING—The Subgrantor agrees to reimburse the Subgrantee not to exceed the amount listed herein after "TOTAL"

PRIOR AMOUNT $ -0-
INCREASE/DECREASE $ -0-
TOTAL $ 12,481,553

7) TERM—From 10-1-83 Through 6-30-84
8) EFFECTIVE DATE OF AMENDMENT ______

9) MODIFICATION—The purpose is: ______

10) APPROVED FOR SUBGRANTOR By Signature	(11) APPROVED FOR SUBGRANTEE By Signature
Title	Title Michael D. Antonovich, Chairman Board of Supervisors

hereby certify that to my knowledge budgeted funds are vailable for the period and purpose of the expenditure ted above.

ignature of Accounting Officer for EDD

ATTEST: RICHARD A. SCHOENI
ASSISTANT EXECUTIVE OFFICER —
CLERK OF THE BOARD OF SUPERVISORS
By Patricia Palk Dep

Exhibit F

STATEMENT OF CONCURRENCE

This is to certify that the Subgrantee for the Service Delivery Area COUNTY OF LOS ANGELES, the Private Industry Council and the Chief Elected Officials concur in the following:

☒ Attached Subgrant Agreement, Registration No. 83002587

☐ Attached Subgrant Agreement amendment #_____, Registration No. __________

☒ Job Training Plan

☐ Job Service Plan

☐ Selection of deliverers of services

☐ Selection of administrative entity

ATTEST: RICHARD A. SCHOENI
ASSISTANT EXECUTIVE OFFICER —
CLERK OF THE BOARD OF SUPERVISORS
By Patricia Polk Deputy

CONCURRENCE OF SUBGRANTEE

Michael D. Antonovich, Chairman
Board of Supervisors
Name and Title

Michael Antonovich
Signature

CONCURRENCE OF PRIVATE INDUSTRY COUNCIL

Berwyn Fragner
Interim Chairperson
Name and Title

Signature

CONCURRENCE OF CHIEF ELECTED OFFICIAL(S)

Michael D. Antonovich, Chairman
Board of Supervisors
Name and Title

Michael Antonovich
Signature

2. ____________________
Name and Title

____
Signature

3. ____________________
Name and Title

____
Signature

RESOLUTION

This will certify that the Board of Supervisors of the County of Los Angeles has agreed by Board action dated AUG 16 1983 to accept a subgrant from the State of California, Employment Development Department, and has authorized the following officer identified by title to conduct needed negotiations and to sign all necessary documents and agreements.

(Specify by title only, not name)

Chairman, Board of Supervisors
Director, Department of Community Services

SIGNED: Michael D. Antonovich
TITLE: Chairman, Board of Supervisors

ATTEST: RICHARD A. SCHOENI
ASSISTANT EXECUTIVE OFFICER —
CLERK OF THE BOARD OF SUPERVISORS
By Patricia Palk, Deputy

GENERAL PROVISIONS

A. BASIC PROVISIONS The following provisions apply to all Subgrantees:

1. The Subgrantee has been selected to receive funds under this program and shall provide services in and for the Service Delivery Area designated in this agreement in accordance with the provisions of this Subgrant Agreement and all exhibits attached hereto.

2. In its performance under this agreement the subgrantee shall fully comply with the requirements of:

    a. The Job Training Partnership Act (JTPA) Public Law 97-300, all federal regulations and Governor's policies and procedures issued pursuant to JTPA, and any new legislation, regulation, policy and procedures which may replace JTPA;

    b. The Family Economic Security Act (FESA), California Unemployment Insurance Code, Section 15000 et seq., to the extent permitted by federal law; all State regulations and Governor's policies and procedures issued pursuant to FESA; and any new legislation, regulation, policy and procedures which may replace FESA and;

    c. The terms and conditions of this agreement and all applicable federal, federal, State and local laws, regulations and policies.

3. If the regulations promulgated pursuant to JTPA or FESA are amended or revised, the Subgrantee will comply with such revisions or will notify the Employment Development Department (EDD) within 30 days after promulgation of the amendments or revision that it cannot so conform so that EDD may take appropriate action including termination of the subgrant, if necessary.

4. Funding of this subgrant is contingent on the availability of federal or State funds and continued federal or State authorization for program activities, and is subject to amendment or termination due to lack of funds or authorization.

5. This subgrant is subject to modification and termination as necessary in accordance with requirements contained in any future federal or State legislation, regulations or policy.

6. In the event of any termination, all property, finished or unfinished documents, photographs, data, studies and reports or unused supplies prepared or purchased by the Subgrantee under this subgrant shall be disposed of in accordance with direction from EDD. In addition, any tools and/or equipment furnished to the subgrantee by EDD and/or purchased by the subgrantee with funds pursuant to this agreement shall be limited to use pursuant to this agreement and shall remain the property of the United States Government and/or State of California, EDD. Upon termination of this agreement, subgrantee shall immediately return such tools and/or equipment to EDD or dispose of them in accordance with the directions of EDD,

July 15, 1983

unless the property is described in Exhibit [illegible]/Budget Plan, as property to be expended during the period of time before this agreement is terminated.

7. At the expiration of the term of this subgrant or upon termination prior to the expiration of the subgrant, funds not obligated for the purposes of this subgrant shall revert to EDD. (All obligations must be expended within two years of termination.)

8. Termination

   a. Subgrantee may terminate this subgrant upon ninety days written notice to EDD.

   b. EDD may terminate this subgrant upon written notice at such time and to such extent as funds are reduced or not made available to EDD by the U.S. Department of Labor or the California State Legislature.

9. Modification

   This subgrant may be amended only in writing by the mutual agreement of the parties hereto.

   a. Any modification to this subgrant, except 15 percent variation annually in the Budget Summary (Chart II), Exhibit E or a 15 percent annual decrease in services to a participant category in the Participant Program Plan, Exhibit D, shall require the written approval of Subgrantor.

   b. Any modification affecting the SDA Plan in the manner described in Section 104(c) of JTPA is subject to approval as setforth in Section 105 of JTPA.

10. All notices of termination or modification may be personally delivered or may be delivered by deposit in the United States Postal Service, postage prepaid, and shall be deemed to have been given at the time of personal delivery, or of the date of deposit in the mail. Notices to the Subgrantee shall be addressed to:

    Mr. Donald G. Galloway, Director
    Department of Community Services
    [illegible] West Sixth Street
    Los Angeles, California 90020.

    Notices to EDD shall be addressed to:

    State Job Training Partnership Office
    800 Capitol Mall, MIC 69
    Sacramento, CAlifornia 95814

11. Cash Management

   a. In order to minimize the amount of time between the receipt of advanced funds and their subsequent disbursement, each subgrantee will time its request for cash to coincide with cash needs. Subgrantees will assure that no excess cash is on deposit.

Generally, if only sufficient cash is on deposit to cover approximately three day's average disbursements, EDD will not consider the amount to be excessive. In this regard, advances to subsubrecipients and/or contractors are not considered to be cash on hand for the subgrantee.

The subgrantee understands and agrees that failure to adhere to these provisions may result in the subgrantee being funded through a monthly reimbursement process.

b. To request funds, subgrantee may submit written requests or make telephone requests (verified by a subsequent written confirmation).

EDD will advance funds as needed to the subgrantee and will make every effort to assure funds are received when needed.

c. The Employment Development Department retains the authority to adjust specific amounts requested if EDD's records and subsequent verification with the subgrantee indicate that the subgrantee has an excessive amount of cash in its account.

12. Subgrantee shall establish such fiscal controls and fund accounting procedures as required by JTPA and State and federal regulations or as may be deemed necessary by the Governor to assure the proper disbursal of, and accounting for, federal funds paid to the subgrantee under the Job Training Partnership Act.

a. The Subgrantee shall comply with Federal Regulations 41 CFR 29-70.102, as they relate to charging direct and indirect costs.

b. EDD, the U.S. Department of Labor, the Office of the Inspector General and the Comptroller General shall have the right to observe, monitor and/or evaluate all conditions and activities in the Service Delivery Area, and to investigate, examine, and audit all records, books, papers or documents related to the conduct of programs funded by this subgrant.

c. The Subgrantee shall maintain such program and fiscal records and make such program statistical and fiscal reports as are required by EDD and/or the U.S. Department of Labor with regard to the Service Delivery Area. Subgrantee agrees to comply with procedures established by the Governor regarding timely completion and submission of required reports.

d. Subgrantee agrees to retain all records pertinent to all grants and agreements under the JTPA, including financial, statistical, property and participant records and supporting documentation for a period of three years from the date of obligation of funds. If at the end of three years there is ongoing litigation or an audit involving those records, the subgrantee will retain the records until the resolution of such litigation or audit.

13. Subgrantee will comply with policy and procedures established by the Governor with respect to the utilization of any income (including interest) generated as a result of the receipt of Job Training Partnership funds. The Subgrantee will account for this income separately and hold it in trust until directed by the Governor.

14. Subgrantee shall establish a management information system and a participant data system, as prescribed by the Governor. The participant data system will contain specific detail enough to demonstrate compliance with relevant eligibility criteria (including verification of eligibility), and to track the participants' progress for the purposes of measuring performance and, where appropriate, duration of participation.

15. Subgrantee shall establish and adhere to an appropriate system, consistent with federal, state and local law, for the award and monitoring of contracts which contain acceptable standards for ensuring accountability.

    The system for soliciting and/or developing performance based contracts (20 CFR, Part 629.38(e)(2)) must include sufficient documented analysis to assure the subgrantee that costs billed as a single unit charge are reasonable.

16. Subgrantee shall ensure diligence in managing programs under this agreement including the carrying out of the appropriate monitoring activities (including audit) and in taking prompt corrective action against known violators of the Act. Specifically:

    a. Audits shall be conducted in accordance with the Standards for Audit of Governmental Organizations, Programs, Activities and Functions and with the policies and procedures established by the Governor. Audits will take place at least once every two years or as deemed necessary by the Governor. Subgrantee agrees to comply and cooperate with all audit surveys, audits and any request by the Governor to secure an audit or an audit waiver (per Section 164 of PL 97-300) on behalf of a subrecipient.

    b. The Subgrantee shall: maintain and make available to auditors (at all levels) adequate records; cooperate with all auditors; comply with all Federal regulations, local, State and Federal laws that are cited in the FESA and JTPA laws as they relate to the utilization of funds or operation of programs.

    c. Subgrantee or auditors performing audits of the subgrantee or its subrecipients shall immediately report to EDD any incidents of fraud, abuse or other criminal activity in relation to this subgrant, the Act, or regulations.

July 15, 1983

17. Personal or real property procured with JTPA funds or transferred from programs under CETA will be used for the purposes of JTPA and the subgrantee will adhere to procedures and recording requirements as may be published by the Governor in order to maintain accountability for property in SDAs.

18. The Subgrantee agrees, to the extent permitted by law, to indemnify, defend and save harmless EDD, its officers, agents and employees from any and all claims and losses accruing or resulting to any and all contractors, subcontractors, material persons, laborers and any other persons, firms or corporations furnishing or supplying work, services, materials, or supplies in connection with the performance of this subgrant, and from any and all claims and losses accruing or resulting to any person, firms or corporations which may be injured or damaged by the Subgrantee in the performance of this subgrant.

19. This subgrant contains the entire agreement of the parties and supersedes all negotiations and any other agreements between them. This subgrant is not intended to and shall not be to create the relationship of agent, servant, employee, partnership, joint venture or association between EDD and the Subgrantee.

20. Compliance

Failure on the part of the Subgrantee or a Subcontractor of the Subgrantee to comply with these provisions or with the Act or regulations may result in the issuance of a Notice of Intent to revoke approval of all or part of this subgrant as provided in JTPA, Section 164(b)(1). Consistent with State and Federal law funds may be withheld for those projects in which corrective action has not been taken until the Secretary of Labor issues a final determination on the Notice of Intent to revoke.

21. Except to the extent that State legislation permits or will permit the State to asume liability, subgrantee shall be liable for all amounts which are determined to be due by the Secretary of Labor, including but not limited to, disallowed costs, which are the result of subgrantee's or its contractor's conduct under this subgrant. Subgrantee shall be notified and shall be permitted to participate in any controversy or proceeding between subgrantor and the Department of Labor arising from this Subgrant.

B. SPECIAL PROVISIONS The following provisions apply if the Subgrantee is a nongovernmental entity (includes the Private Industry Council but does not include a consortium agency created by a Joint Powers Agreement.):

1. Prior to any disbursements of JTPA funds under this Subgrant Agreement, the Subgrantee agrees to provide to EDD an assurance that all

persons handling funds received or disbursements made hereunder are covered by fidelity bond in an amount not less than $ N/A . If the bond is cancelled or reduced, Subgrantee shall immediately so notify EDD. In that event, EDD shall make no further disbursements until it is assured adequate coverage has been obtained.

2. With respect to performance under this subgrant, and prior to final subgrant processing and approval, Subgrantee agrees to obtain and maintain in full force and effect throughout the period of this subgrant, the following minimum insurance coverages:

   a. General liability insurance with a combined limit of $500,000 or public liability coverage for $500,000 and property damage coverage for $100,000. Regardless of the type of coverage secured, a minimum aggregate of $500,000 for public liability and for property damage is required.

   b. Broad form automobile liability coverage with limits as set forth in (a) above, which applies to both owned/leased and non-owned automobiles used by the Subgrantee or its agents in performance of this subgrant, or, in the event that the Subgrantee will not utilize owned/leased automobiles but intends to require employees, trainees, or other agents to utilize their own automobiles in the performance of this subgrant, Subgrantee will secure and maintain on file from all such employees, trainees, or agents a self-certification of automobile insurance coverage.

   c. Workers' Compensation Insurance, which complies with provisions of the California Labor Code, covering all employees of the Subgrantee and participants enrolled in work experience programs. Medical and Accident Insurance will be carried for those participants not qualifying as "employed" (Section 3352. et seq. of the California Labor Code) for Workers' Compensation.

3. EDD will be named as certificate holder of policies secured in compliance with paragraphs 2. (a) and 2. (b) above and will be provided certificates of insurance or a copy of the insurance or insurance underwriter's "binder" prior to performance under the subgrant verifying compliance with subgrant insurance requirements. The coverages noted in 2. (a) and 2. (b) above must contain the following clauses:

   a. Insurance coverage will not be cancelled or changed unless 30 days prior to the effective date of cancellation or changes written notice is sent to:

      Employment Development Department
      c/o State Job Training Partnership Office
      800 Capitol Mall, MIC #69
      Sacramento, California 95814

July 15, 1983

b. State of California, its officers, employees, and servants are included as additional insureds.

c. The State of California is not responsible for direct payment of premiums or assessments on this policy.

4. Subgrantee shall comply with Executive Order No. 11246, entitled "Equal Employment Opportunity" as supplemented in Department of Labor regulations (41 CFR Part 60). Subgrantee hereby assures that it has an Affirmative Action Plan which is applicable to and covers staff and participants reimbursed through this subgrant, which declares that it does not discriminate on the basis of race, color, religion, creed, national origin, physical handicap, sex, political affiliations or beliefs and age and which specifies goals and target dates to assure the implementation of that plan. Subgrantee will file the approved documentation of the above Affirmative Action Plan with EDD (Office of Employment and Training) 10 days before the start of actual program operations.

5. Advanced funding

Before any advance is made under this Agreement, the Subgrantee shall transmit an agreement with a bank to EDD establishing a Special Bank Account. All funds under this Agreement, including advance payments, shall be made by check or wire transfer payable to the Subgrantee for deposit only in said Special Bank Account. No part of the funds in the Special Bank account shall be commingled with other funds of the Subgrantee. The funds in the Special Bank Account may be withdrawn by no less than two representatives of the Subgrantee authorized herein solely for the purpose of making payment for items of allowable costs pursuant to the terms of this Agreement or to reimburse the Subgrantee for such items of allowable cost. EDD shall have a lien upon any balance in the Special Bank Account paramount to all other liens.

a. Any two of the following persons are jointly authorized to withdraw funds from said Special Bank Account to pay costs incurred on behalf of the Subgrantee for the performance of this Agreement:

______________________________ ______________________________

______________________________ ______________________________

b. The following person(s) is (are) authorized to request funds from EDD for deposit in said Bank Account. (The requestor of funds should be a different individual than the disbursor of funds.)

____.

6. Before any funds are issued under this Agreement, the Subgrantee shall submit to EDD the findings of the most recent audit of its financial systems. If such audit was prior to July 1, 1981 or if no audit has been conducted, a pre-award survey of the subgrantee's accounting procedures and controls will be conducted and the results of such survey submitted to EDD.

July 15, 1983

7. Before any funds are issued under this agreement, the Subgrantee shall stipulate how, if it becomes necessary, the Subgrantee will repay disallowed expenditures with nonfederal funds.

8 Before any funds are issued under this agrement, the Subgrantee, if it is a private nonprofit entity, will submit a copy of its status certification by the Secretary of State's Office verified by the Franchise Tax Board.

9. Certification

The subgrantee certifies it is qualified and licensed to conduct business in the State of California.

July 15, 1983

Exhibit 5

STANDARD OF CONDUCT

Subgrantee hereby assures that in administering this EDD subgrant, it will comply with the standards of conduct hereinafter set out, for maintaining the integrity of the project and avoiding any conflict of interest in its administration.

General Assurance

Every reasonable course of action will be taken by the subgrantee in order to maintain the integrity of this expenditure of public funds and to avoid any favoritism, questionable or improper conduct. This subgrant will be administered in an impartial manner, free from personal, financial or political gain. The subgrantee, its executive staff and employees, in administering the subgrant, will avoid situations which give rise to a suggestion that any decision was influenced by prejudice, bias, special interest, or personal gain.

Conducting Business Involving Relatives

No relative by blood, adoption or marriage [1] of any executive or employee of the subgrantee, will receive favorable treatment for enrollment in services provided by, or employment with, the subgrantee.

Conducting Business Involving Close Personal Friends and Associates

Executives and employees of the subgrantee will be particularly aware of the varying degrees of influence that can be exerted by personal friends and associates and, in administering the subgrant, will exercise due diligence to avoid situations which may give rise to an assertion that favorable treatment is being granted to friends and associates.

When it is in the public interest for the subgrantee to conduct business with a friend or associate of an executive or employee of the subgrantee, an elected official in the area or a member of the Private Industry Council, a permanent record (see Section A, item 12(d) of the Provisions on page 4) of the transaction will be retained.

Avoidance of Conflict of Economic Interest

An executive or employee of the subgrantee, an elected official in the area or a member of the Private Industry Council, will not solicit or accept money or any other consideration from a third person, for the performance of an act reimbursed in whole or part by the subgrantee or EDD. Supplies, materials, equipment or services purchased with subgrant funds will be used solely for purposes allowed under the subgrant.

No member of the Private Industry Council shall cast a vote on the provision of services by that member (or any organization which that member represents) or vote on any matter which would provide direct financial benefit to that member or any business or organization which the members directly represents.

---

[1] For the purpose of this agreement "relative by blood or marriage" shall include: wife, husband, son, daughter, mother, father, brother, brother-in-law, sister, sister-in-law, son-in-law, daughter-in-law, mother-in-law, father-in-law, aunt, uncle, niece, nephew, stepparent, and stepchild.

COUNTY OF LOS ANGELES PROGRAM NARRATIVE

A. LOCAL CONDITIONS

1. Potentially Eligible Population

Los Angeles County plans to serve targeted welfare recipients, specifically General Relief (GR), Aid to Families With Dependent Children - Unemployed (AFDC-U), Aid to Families With Dependent Children-Family Group (AFDC-FG), youth (ages 16-21), and other JTPA eligible individuals during this nine-month interim program. The targeted welfare client population, all of whom are unemployed, will make up a large portion of the client population to be served.

This program was developed as part of an extensive effort to develop self-sufficiency among welfare recipients, reduce welfare dependency, and lower County, State, and Federal welfare costs. As the County prepares for the upcoming Family Economic Security Act (FESA), it is able to draw upon the Targeted Welfare Program to provide a comprehensive system for integrating the existing welfare system with available training and employment services.

This client population relies heavily on public transportation in terms of commuting. The Los Angeles County SDA has a highly sophisticated transit system. It is interconnected by twenty-two freeways and hundreds of surface streets and other transit routes. There are no major physical boundaries separating any areas from the rest, except for Santa Catalina and San Clemente Islands. Where appropriate, bus tickets will be provided to participants during their first week of orientation/training or until they receive their first paycheck.

Traditionally, this client group is in need of vocational/job search skills, English-as-a-Second Language (ESL), child care and adult basic education (ABE). The attached General Relief Recipient Profile provides additional information (Attachment A). Staff from the County's Department of Public Social Services (DPSS) will determine client eligibility. The Department of Community Services and contracted service providers will assess each individual's specific needs and will refer each individual to the contracting service provider which will best meet the client's training needs. This allows for an effective match of clients with available services and provides for "up front" arrangements for transportation, child care and other needed services.

A minimum of 40% of the resources will be used to train youth participants. Youth will be trained in classroom training, work experience and on-the-job training activities. Exemplary youth programs are being considered, and will be finalized during service provider selection and contract development.

2. Economy and Job Market in the Service Delivery Area

    a. Some of the major industrial segments and largest major employers in the Los Angeles County Service Delivery Area are services, government, retail trade and manufacturing. Services, government and retail trade grew in employment the most during 1982. Jobs in the services area accounted for 50% of the total of 46,500 job increases in all non-agricultural industries. The largest increase in jobs were in the health, business, and legal services. Collectively, these sectors accounted for 75% of all job growth. Employment in this industry (services) is expected to continue growing throughout 1983. Employment in healthcare should expand during the first half of 1983. Business services are expected to fare well during the year including advertising, personnel agencies and protective service agencies.

Government expansion occurred primarily in state and local education sectors. A little over half of the jobs created in this industry in 1982 were in these two sectors.

Employment growth in retail trade has accounted for 12.3% of all non-agricultural job growth in the County during 1982. Eating and drinking places accounted for the greatest increases. Of the 5,700 jobs created during the year, 5,200 of them were from this sector. This industry had the smallest overall employment decline of those industries declining in 1982 (-0.3%). For every 4 jobs lost, 3 were created during last year. Assuming that the economy improves in 1983, this industry will expand, particularly during the holiday seasons.
Job gains in the wholesale trade industry will

probably occur slowly in 1983, continuing in the nondurable goods sector, and only expanding into other areas when the economy improves.

Finance, insurance and real estate, and manufacturing expanded to a small degree in 1982. Because so many jobs were lost in these industries, in comparison to gains, modest increases are expected in the finance sector during 1983. Those small increases in employment occurring in manufacturing will be in women's and misses' outerwear, communication equipment, toys, and sporting goods.

Aerospace related manufacturing, after realizing job losses over the past year, should begin to stabilize during 1983. The awarding of major military contracts to this area recently has caused several primary contractors to begin hiring workers.

Emerging industries in Los Angeles will probably be those expanding in employment at this time. They will result from breakthroughs in high technology relating to computer science, electronics, electro-optics and biological engineering. The successful growth of these industries depends upon continuing investment in existing companies located in Los Angeles County.

Those industries showing the most potential for continued growth, or diversification into the above mentioned technologies, are in business and health services, and in the manufacture of plastics materials and synthetics, structural clay products, and communication equipment. Wholesale and retail businesses will also grow as a by-product of the increasing demand for products and services offered through developments by these companies.

The strategy employed in identifying skill requirements was to equate them with occupations in demand. Using this orientation, an analysis of existing labor market resource documents has been reviewed in order to identify skill requirements. According to the Employment Data and Research Division of the State EDD, their report entitled "Projections of Employment 1980-85" was useful for estimating long term job demand. Another document published by the State EDD, entitled "Labor Supply and Demand" was useful for estimating short term job demand. Using these documents, together with the report called "California Occupational Guide", and the Bureau of Labor Statistics report "Occupational Outlook Quarterly", occupations in demand have been determined. These occupations include:

Professional & Technical Occupations

Electronic Technician
Drafter, Mechanical

Nurse, General Duty and Licensed Practical
Medical Technologist
Computer Operator
Computer Programmer
Computer Systems Analyst
Computer Systems Service Technician
Dental Assistant

Clerical Workers

Clerk Typist
Data Coder Operator
Key Punch Operator
Word Processor Operator
Clerk, General
Bookkkeeper
Bank Teller
Cashier
Stock Clerk

Craftworkers

Auto Mechanic
Auto Body Repair
Electronic Mechanic
Dental Lab Technician

Operatives

Electronic Assembler
Sewing Machine Operator, Garment
Truck Driver, Light

Sales Workers

Salesperson, General Merchandise

Services

Waiter/Waitress
Cook
Nurse Aide
Security Guards
Cleaners, Commercial & Institutional

Although the unemployment rate in Los Angeles County has slowly decreased in the last few months, it still remains on an equal footing with the national rate. Since 1980, there have been at least 452 plant closures in Los Angeles

County, resulting in the loss of 49,653 jobs. This represents over 35% of the plant closures and jobs lost in California during this period.

During 1982 alone, 57% of the plant closures in Los Angeles County (less the cities of Long Beach, Pasadena, Glendale, Torrance, and Los Angeles) and 90.4% of the workers dislocated occurred within the County of Los Angeles. This has had a traumatic effect on the County's labor market. During June 1983, for example, County unemployment stood at 10.2%, as compared with 10.3% for the State and 10.0% for the Nation.

In addition to numerous small plant closures, the County has experienced or will soon experience some major plant closure (General Motors, Huffy Corp., Bethlehem Steel and Aeroquip) which will affect some 7000+ employees. Employment and training programs are one means of assisting these individuals in obtaining permanent, non-subsidized employment and preventing them from becoming welfare recipients.

NOTE: Due to short time frame, the SDA statistics for Los Angeles County concerning local conditions, incorporate the Inglewood Consortium, the Cerritos Consortium and parts of the Glendale, Pasadena and Torrance consortia. When the 2 year plan is submitted in April, 1984, the Los Angeles County SDA statistics will be more precise.

B. GOALS AND OBJECTIVES

1. A Brief Statement of the SDA Performance Goals

The performance goals of the County of Los Angeles are to:

-provide employment and job training opportunities to eligible residents;

-reduce the number of persons receiving AFDC, State or local public assistance;

-reduce the number of persons unemployed;

-enable participants to acquire employable skills;

-train participants in those occupations that are responsive to current labor market and economic conditions;

-provide the necessary related support services necessary to keep a participant in the program;

-increase services to targeted groups, such as youth;

-increase involvement of the private sector through participation in the development of the County's employment and training programs;

-better coordinate and develop linkages with those agencies providing related services to ensure that programs are coordinated and non-duplicative.

-reduce education deficiencies; and

-assist participants in obtaining permanent unsubsidized employment.

Specifically, by providing appropriate employment and training services to the target client population the County will be enhancing their employability, their marketable skills, and therefore, their potential for higher wages. In addition, participants will receive employment services which include job development, job placement and job retention skills. The County will be selecting as service provider those most successful in obtaining employment for and providing employment and training services to eligible participants.

By providing training services, English as-a-Second Language, preemployment training and other supportive services to JTPA eligible participants, the County will be assisting these individuals in overcoming personal and environmental handicaps which inhibit their employability.

Local economic development linkages will be developed where separating any areas from the rest, except for Santa Catalina been finalized at this time.

2. Description of how SDA Plans to Achieve the Governor's Goals and Objectives

   a. The County will attempt to meet these goals, as adjusted for the County's Service Delivery Area.

b. See Chart C III

c. The County will meet the Governor's primary employment and training goal to provide vocational education, job training and employment services to eligible, economically disadvantaged individuals and displaced workers, in order for them to obtain private sector employment, as follows:

The County will select service providers who have demonstrated effectiveness in serving JTPA eligible clients. These service providers will be expected to enter into a fixed-rate performance contract whenever possible. Fixed-rate performance contracts require successful completion of training and placement in order for service providers to receive reimbursement for costs. The County feels that this mechanism will assure that the Governor's performance goals and objectives will be met.

In addition, service providers will be required to develop programs appropriate to the clients served and to meet the employment needs of the private sector.

3. PIC Methodology Regarding Youth Programs

The Los Angeles County Private Industry Council (PIC) was appointed on July 14, 1983 and will be developing employment competency standards for youth programs.

4. System Goals

The County has in place an automated Management Information System (MIS) which collects and organizes data in a manner that allows other departmental staff to continuously plan, operate, and evaluate programs. The overall objective of the system is to collect, organize, and print-out information to: (1) meet all mandated State reporting; (2) provide program evaluation and control data; and (3) to provide management with key information for planning and decision making.

MIS also conducts a bi-monthly analysis of various reports, such as, participant listings, terminations, and participant characteristics to ensure validation. Subcontractors are provided with reports to certify that the information is correct.

The County is in the process of also automating its fiscal system and planning process. This process would provide automated information which would enable the County to prepare reports, modifications and applications with the most current information available in a shorter time span.

C. SERVICES TO BE PROVIDED

1. Method by which Training will be Delivered

The following is a brief description of each activity and service provided by Los Angeles County under Title II-A of JTPA. The expected outcomes for these activities is placement in unsubsidized employment.

Relevant to all activities, participants will be trained from the following principal occupational areas:

Painter Trainees
Typist/Clerk
Bookkeeper

Billing Clerk
Photoengraver
Plate Printer
Auto Mech./Appren.
Adult Basic Education
Maintenance
Food Service Worker
Horticulture
Factory/Assembly
Insurance Clerk
Medical Records Clerk

Machinist
Skip Tracer
Credit Consultant
State Investigator

Industrial Accident
  Investigator/Ins. Co.
Credit Verifier
Attorney Services
Bank Mgmt. Trainee
Medical Assistant
Transcription Specialist
Insurance Specialist
Teacher's Aide

Drill Press Operator
Punch Press Operator
Upholstery/Furniture

Warehouseperson
Shipping/Receiving Clerk
Bank Teller
EKG Technician
Nurses Aides
Dental Assistant
Medical Receptionist
Keypunch Repair
Heavy Truckdriver
Optometric Assistant
Credit Collector

Motorcycle Repair
Medical Secretary
Medical Office Manager
Apprentice Carpenter
Data Entry Clerk

Welders
Refrigeration Mechanic
Alarm Installers
Secretary
Child Care Teaching Assts.
Statistical Typist
Airline/Travel Trainee
Accountant
Auto Body Trainees

Training activities will be comprised of adult and youth programs. Approximately 60% of the JTPA allocation will fund adult programs and the remaining 40% (minimum) will fund youth programs. There are no legal requirements for particular types of youth or adult activities other than the mandate to utilize at least 40% of the resources for youth programs (under the age of 22).

Adult Programs (22 years of age or older):

Classroom Training

Los Angeles County's program includes training conducted in an institutional setting for vocational education which is designed to provide individuals with the technical skills and information required to perform a specific job or group of jobs. This activity may also include training aimed at enhancing the employability of individuals by upgrading basic skills through provision of courses in, for example, remedial education (Adult Basic Education - ABE) or English-as-a Second Language, with subsequent or concurrent enrollment in a vocational education course of instruction. Also combined activities such as Classroom Training/Work Experience will be utilized where appropriate for the individual client. The estimated duration of service will range from two to six months.
Stipends will be paid those individuals who are eligible to receive them in accordance with Department of Labor regulations. Determination of stipends and their payment shall be the responsibility of the County.

Pre-employment/OJT

This program activity provides occupational training, conducted in a work environment, which enables an individual to learn a skill and to qualify for the occupation through demonstration and practice.

The planned activities will relate to the needs of the client population. The training is so designed that it should enable individuals to acquire adequate skill levels to obtain immediate employment and enhance their ability to retain such employment. On-the-Job-Training may be conducted with either private or public employers. In each case the training must be conducted on a "hire first, train later" basis. The contractor can reimburse the employer, for extraordinary training costs for training on the job, up to a level not to exceed 50% of participant wages. The contractor must provide for training commensurate with the skill levels identified in the job description and training outline for a period of time no less than 8 weeks. Skill level type occupations with a training duration of 6-9 months will be encouraged. In all cases, the Dictionary of Occupational Titles (D.O.T) shall be used to determine the specific lengths of training for each occupation in which On-the-Job-Training work slots are developed. A combined feature to On-the-Job Training this year is preemployment training. A portion of the targeted service population will consist of welfare recipients, whose work histories do not suggest stable, successful employment. Retention of these individuals in training with employers is very low. Pre-employment training, which consists of development of good work attitudes and habits, grooming, resume writing, mock job interviews, meeting child care needs and transportation difficulties, will enhance the the participants' ability to secure and remain on the job with an employer. In situations where applicable, the employer will be involved in this effort.

Classroom Training/Work Experience

The primary emphasis in this combined training activity is work experience. Traditionally, it is designed to enhance the potential of adults in obtaining a planned occupational goal. The estimated duration of service will range from two to six months. Work experience includes the following:

- short-term employment for participants who have no occupational goals and for whom no training or job opportunity is immediately available.
- short-term employment for participants who have no definite occupational goals or training and for whom a job opportunity is being developed.

The following are contractor responsibilities:

Work Schedule -

- provide for participants to work a maximum of 8 hours per day according to schedule of work site.

- provide for educational or supplemental activity for the participant.
- ensure that wages shall be commensurate to the type of work performed, provided that this wage is not less than the prevailing minimum wage.

Worksites

It is the responsibility of the contractor to develop and provide worksites in public or private non-profit agencies in order to train and prepare participants for permanent job placement, return to school, or other positive terminations. In selecting worksites the contractor shall:

- provide orientation to all supervisors of work experience participants concerning the objectives of this activity and the procedures to be followed.
- develop worksites in non-profit agencies other than County facilities unless an agreement with the County facility has been approved by the County. The subcontractors must obtain approval from the County for each worksite agreement prior to the placement of any participant at the site.

The combined classroom training activity with work experience for this new JTPA year is designed to enhance the receptiveness of the JTPA participants before they are situated into a traditional work environment.

This will consist of pre-employment training as discussed, in combination with the OJT activity and/or English-as-a-Second Language or Adult Basic Education instructions as most of this population will require remedial instruction. A similar pilot program conducted by the County in 1982-83 confirmed the need for this classroom training activity.

For the Adult program, the average cost per participant will be a low of $630 to a high of $770. Overall, 38.59% of the total adult enrolees will be placed in unsubsidized employment.

Youth Programs (ages 16-21)

In the Youth Program, the average cost per participant will be a low of $3,454 to a high of $3,826.

Classroom Training (ages 18-21)

The description for this activity is the same as the narrative for the adult program. However, out-of-school youths in the age range of 18-21 are emphasized.

On-the-Job Training (ages 18-21)

The description for this activity is the same as the narrative for the adult program. However, out of school youths in the age range of 18-21 are emphasized. Funding in this activity is not substantial so as to not create competition for available slots with the adult OJT program.

This will consist of pre-employment training as discussed, in combination with the OJT activity and/or English-as-a-Second Language or Adult Basic Education instructions as most of this population will require remedial instruction. A similar pilot program conducted by the County in 1982-83 confirmed the need for this classroom training activity.

For the Adult program, the average cost per participant will be a low of $630 to a high of $770. Overall, 32.4% of the total adult enrolees will be placed in unsubsidized employment.

Youth Programs (ages 16-21)

In the Youth Program, the average cost per participant will be a low of $3,826 to a high of $3,454.

Classroom Training (ages 18-21)

The description for this activity is the same as the narrative for the adult program. However, out-of-school youths in the age range of 18-21 are emphasized.

On-the-Job Training (ages 18-21)

The description for this activity is the same as the narrative for the adult program. However, out of school youths in the age range of 18-21 are emphasized. Funding in this activity is not substantial so as to not create competition for available slots with the adult OJT program.

Entry Employment Experience *

This activity is aimed at youth, ages 16-18. These experiences may be up to 20 hours weekly during the school year or full time during the summer and holidays, for a total of not to exceed 500 hours for any individual. Such experiences will be appropriately supervised, including the maintenance of standards of attendance and worksite performance. Entry employment experiences may be one of the following types:

* Emphasis will be on funding youth programs, ages 18-21; however, a very small number of youth programs, such as this, aimed at in-school youth, ages 16-21, may also be considered.

(1) Try Out Employment In The Private Sector. *

This is a training activity aimed at youth (ages 16-21) and provides entry employment experiences. Such experiences will be appropriately supervised, including the maintenance of standards of attendance and worksite performance. Worksite may be private for profit, public and private non-profit when private for profit worksites are not available. The length of any assignment to a try-out employment position shall not exceed 250 hours. These positions shall be ones for which participants would not usually be hired (because of lack of experience or other barriers to employment), and vacancies in positions may not be refilled if the previous participant completed the try-out employment but was not hired by the employer.

(2) Full-time employment opportunities in public and private non-profit agencies during the summer and on a part-time basis in combination with education and training activities. Activities will involve community improvement services.

(3) Cooperative education programs with the private sector.

School to Work Transition *

These are training activities geared towards youth ages 16-18 who are dropouts or high school seniors who plan to enter the full-time labor market upon graduation. Transition services include such things as: occupational information, short duration job search assistance, job clubs, placement and job development, and follow-up.

(a) For this nine-month interim program, the County has decided to use existing contractors, letters of intent, past peformance, and concept papers to select service providers. Targeted Requests for Proposals will be solicited during the program period, if necessary, as funds become available.

As part of the selection process, a County CETA bulletin was sent to all fiscal year 1983 CETA contractors which provided them with information relative to the implementation of JTPA and described the service

---

* Emphasis will be on funding youth programs, ages 18-21; however, a very small number of youth programs, such as this, aimed at in-school youth, ages 16-21 may also be considered.

provider selection process that would be used during 1983/84, the first year under JTPA. Federal regulations implementing JTPA were also attached for their review.

Contractors were advised to examine closely the implications of the JTPA regulations on the operation of their employment and training programs. They were requested to indicate to the County whether they would be interested in continuing as a service provider for FY 1984. Those contractors, who wished to participate in the first year of JTPA as an employment and training subcontractor, were asked to indicate their interest in a letter of intent.

The bulletin detailed how performance would be determined:

> "It should be noted that specific program requirements for contractors in the County's 1983-84 JTPA programs are now being developed. Once these have been finalized, agencies interested in contracting with the County for 1983-84 will be required to demonstrate their willingness and ability to meet those requirements before a contract is recommended.
>
> In the absence of a proposal, particular stress will be placed upon evaluations of agency performance during the contract year 1981/82 and the first two (2) quarters of your 82/83 contract. Performance indicators to be used by the Department in evaluating these programs are described below:

Performance Indicators

1. Placement Rate:

$$\frac{\text{Total Placements}}{\text{Total Terminations}}$$

2. Postive Terminations Rate:

$$\frac{\text{Total Placements and total other positive}}{\text{Total Terminations}}$$

3. Agency cost per placement:

$$\frac{\text{Total Admin., Training, and Service Expenditures}}{\text{Total Placements}}$$

4. Agency cost per positive termination:

$$\frac{\text{Total Admin., Training, and Service Expenditures}}{\text{Total placements and total other positive terminations}}$$

5. Post Training Wages

6. Job Retention Rate

7. Administrative Capability

8. Planned vs actual, especially with regard to significant segments served and service to participants.

Minimum levels of performance adopted by the Private Industry Council (PIC) will be adhered to. These are as follows:

Classroom Training:	55% Placement Rate 85% Completion Rate
On-the-Job Training:	65% Placement Rate 85% Completion Rate
Work Experience/: Out-of-School	50% Placement Rate 85% Completion Rate

NOTE: Placements made more than 30 days after termination will not be counted as a placement for evaluation purposes.

Deviations of no more than 10-15% are allowed for agencies serving special target groups (at least 50%), such as offenders, handicapped and youth. The AFDC-U/GR referrals will be evaluated separately. While no agency will be penalized for serving large numbers of AFDC-U/GR referrals, success with this group will be viewed very favorably, especially since the Job Training Partnership Act of 1982, which goes into effect in 1983, focuses heavily on welfare recipients.

Assessments will be made separately for each program activity (classroom training, on-the-job training, and work experience) and the results ranked within each category. An agency's ranking will indicate its effectiveness as compared to othe agencies providing the same activity.

Contracts for 1982-83 were developed in accordance with what agencies indicated were their minimum needs to operate an effective program. Agency administrators and their Board of Directors should be aware that those costs may or may not prove to be competitive with other agencies providing similar training. Agencies are, therefore, alerted to the fact that mere adherence to contract goals will not in itself guarantee refunding or a high ranking in performance assessments.

The County is presently looking at performance contracts to see if they require a different performance evaluation process. If a separate evaluation process for performance contracts is developed, appropriate service providers will be notified.

Informaton used to develop the evaluations will be provided to service providers for review before evalutions are completed. It is the responsibility of each service provider to make certain that any inaccuracies are resolved with our Management Information System (MIS) unit within the allotted time provided.

This evaluation tool will be applied to the quarter ended March 31, 1983. Please make certain that MIS has all appropriate information for the quarter as soon as possible."

This statistical information was compiled for all contractors and submitted to the Private Industry Council (PIC) for their approval. The PIC reviewed each FY 1983 CETA contractor's statistics individually and made their recommendations to the Board of Supervisors. Recommendations were based on factors which included statistical data, a contractor's ability to function under JTPA regulations, geographic locations, activities conducted and training occupations offered.

(b) See chart C-II

(c) See chart C-II

2. Exemplary Youth Programs

The county of Los Angeles is currently in the process of selecting service providers. Where appropriate, these agenceis may administer one or more of the exemplary youth programs described in Section 205 of the Act; however, specific information, such as, program description, outcomes and performance measures, will be provided at a later date.
(See prior description of youth programs)

a. See chart C-II
b. "
c. "
d. "

3. Client Services

Client services to be provided include, but are not limited to: outreach, counseling, job search assistance, needs based payments, supportive services, placement services, job development, and follow-up. Duration of service will vary by participant depending on need and type of service.

(a) Those client services necessary to keep a participant in training and/or those services necessary to help a participant complete the transition into unsubsidized employment will be given first priority and will be based on individual need.

(b) In the past the following entities have provided services for the county's employment and training programs. It is planned that these same entities will be utilized for the JTPA program.

The County maximizes services to job training clients through coordination and linkages with a variety of agencies, programs and organizations. Linkages include, but are not limited to:

AGENCY	SERVICES PROVIDED
Local School Districts	Arrange for academic credit to be awarded to participants
California State Department	provide joint funding with the County to innovative vocational education programs

Private Sector Business	provide On-the-Job Training Provide Vocational Exploration
	Provide job commitments in customized training programs
	Private Industry Council (PIC) participation
Department of Rehabilitation	Referral services of clients to the County's employment and training programs
	Supportive services to handicapped participants locally proposed for representation of the new County PIC
	Technical assistance to County and subcontract agencies on services available to handicapped participants
	Documentation of participant's handicapped status
State Economic and Business Development Department	Identification of expanding and new businesses
	Identification of economic development areas
State Division of Apprenticeship Standards	Representation on PIC
	Review of proposed vocational training programs for conformity with established State standards
Department of Public Social Services	Referral of welfare clients for placement in training programs
	Representation on PIC
Community Based Organizations	Provide a network of various referral and supportive services.

The County will be negotiating a Non-Financial Agreement with EDD to coordinate activities and services to be provided by EDD to the County and to County training participants. Activites and services planned will include:

- Applicant Screening
- Employment Counseling
- Vocational Testing
- Recruitment Services
- Vocational Training Referral
- Job search Workshop
- Use of listing programs, which gives employers with Federal contracts an opportunity to identify and hire veterans
- EDD referral of participants for Job Service Assistance Programs
- Labor Market Information
- Job Corps Participant Referrals
- Participation in public information efforts

(c) Whenever possible, supportive services will be provided by service providers at no JTPA cost (adult programs). Service Providers will be expected to fulfill service needs of the individual client through other non JTPA resources, such as, matching funds or funds from other sources.

4. Employer related services will be provided by the County's JTPA contractors who have demonstrated the capability of providing employment and training services in accordance with the JTPA regulations. These contractors will be operating, whenever possible, on fixed-rate performance contracts which require successful placements of participants (positive termination for in-school youth) into unsubsidized employment in order for that portion of the contract to be reimbursed. The County feels that such types of contracts help enforce the program goal of obtaining employment and positive terminations for participants.

Major emphasis will be placed on obtaining employment through job openings. Employment generating activities will be used to solicit private industry interest in JTPA training programs for participants planning to complete training and who would be seeking unsubsidized placements or customized training opportunities.

D. CLIENTS TO BE SERVED

1. and 2.

Although the County plans to target a large portion of the adult program to welfare recipients, non-welfare JTPA-eligible participants will be included in other segments of the program.

During the nine-month initial implementation period of the adult JTPA program an effort will be made to move employable General Relief (GR)/Aid to Families with Dependent Children Unemployed (AFDC-U) recipients into work/training activities. The County Department of Public Social Services (DPSS) has identified a potential caseload of 10,532 GR-Employable in its service area (See Attachment A).

Based upon the results of the County of Los Angeles' pilot program of GR placement into the CETA program, the County estimates a minimum of 4,700 continuous jobs slots will be provided for this activity during the nine-month period.

3. and 4.

The County will provide employment and training opportunities to school dropouts and other substantial segments at equitable levels. Service providers will be encouraged to provide equitable levels of services to all segments represented in this targeted client population.

5. Determination will be made at a later date.

E. COORDINATION

Because of the limited time available to develop this interim nine-month plan and because the County's PIC has not yet been available to give direction in the area of coordination, the County can only describe what it will do in the area of coordination.

Coordination with the following will be accomplished during the nine-month interim program:

- Other agencies within the SDA providing job training, vocational and remedial education, and client advocacy;
- State and local secondary and post-secondary educational agencies;
- Local EDD (cooperation agreement);
- Other SDA's in labor market area;
- JTPA Titles III and IV service providers;
- Governor's Coordination and Special Services Plan.

Coordination with County welfare systems has already begun. The County's Department of Public Social Services (DPSS) and Department of Community Services have developed a referral system to respond to welfare recipient (GR and AFDC-U) employment and training needs. It is estimated that this program will process as many as 10,532 welfare recipients off of the County's welfare rolls.

Outreach and Recruitment

A large portion of program participants will be recruited from the County DPSS GR-Employable caseload and referrals from agencies which deal with youth, including the school districts and County Probation Department.

Other agencies, such as, the State Employment Development Department, County Senior Citizens Affairs Department, County Department of Military and Veterans Affairs and the State Rehabilitation Department will be used to facilitate recruitment efforts as in prior years.

To the maximum extent feasible, participants will be recruited based on the percentage breakdown of each target group within the targeted eligible population as required in Sec. 203 of JTPA.

See Exhibit D for estimated participant program plan.

F. DOCUMENTATION

During this nine-month program period, the Department of Community Services will operate an innovative employment and training program structured to convert employable welfare (Aid to Families with Dependent Children-Unemployed, and General Relief) recipients from a welfare activity to a work/training opportunity.

This project will provide activities which will enable the welfare recipients in the County of Los Angeles to be removed from the welfare rolls and receive job training that will prepare them for unsubsidized employment. The project will assist in controlling the cost of the spiraling General Relief cost that is anticipated for this fiscal year.

The County has ventured into this project to serve approximately 10,000 welfare recipients, including a substantial number of refugees whose Federal reimbursement has expired. In conjunction with the Department of Public Social Services, the project will operate as follows:

- All persons applying for GR benefits will be interviewed to determine their eligibility;
- Upon determining eligibility, an assessment will be made relative to applicant being employable;
- Employability determination will be made on clients presently receiving welfare;
- Eligible, employable persons will be removed from welfare rolls and placed in one of the following activities:

  Job search for immediate job placement through the Department of Community Services Job Development Section; placement in job training programs to enhance skills and prepare clients for unsubsidized employment; or placed in an Income Generating Project.

1. Costs and Payments
   a. Not at this time
   b. Adult welfare participants will receive stipends no less than what they would receive under a welfare grant. Formula would be based on welfare eligibility criteria adopted by Los Angeles County Department of Public Social Services.

2. Services to Clients

   a. Approximately 39% of the participants served by the County may reside outside the County's SDA area. As part of the County's targeted welfare recipient program for adults, the County intends to serve all General Relief employable clients being served now and during this interim period by the County's Department of Public Social Services. These General Relief employable recipients reside throughout the County including areas outside of the County's SDA.

   As an SDA, the County is responsible for welfare programs throughout the County in terms of providing coordination of services to welfare clients.

   The County feels that service to this client population will provide much-needed services to a segment usually not served by employment and training programs. At the same time, the County will reduce welfare dependency and will maximize access for this population segment to employment and training opportunities.

   Presently the County is negotiating with other SDA's regarding the service to General Relief employable recipients that reside in their SDA areas. To date these SDAs appear receptive to the County's adult targeted welfare recipient program.

   b. Determination will be made at a later date.

3. Selection of Service Providers

   a. Due to time constraints, the County is still in the process of selecting service providers to operate the JTPA program. Service providers selected will have been contractors under the CETA program.

   b. No new service providers will be contracted with during this nine month interim program, unless it is in response to a targeted RFP that the County's current contractors cannot provide services for.

4. Title III Program

   a. The County is receiving approximately $1 million in JTPA Title III funds to administor County-wide Dislocated Worker Programs 8/1/83 through 6/30/84.

   b. Yes, the County plans to apply for Title III funds and administer these programs.

DU:sl

JOB TRAINING PARTNERSHIP ACT (1)
PLANNING INFORMATION FOR APPLICANT SERVICE DELIVERY AREAS
JULY 18,1983 REVISION A PRELIMINARY

AME: LOS ANGELES COUNTY (LESS:GLENDALE, LONG BEACH, LOS ANGELES, PASADENA AND TORRANCE)

POPULATION CHARACTERISTICS (2)

	TOTAL	WHITE	BLACK	INDIAN	ASIAN	OTHER	**	HISPANIC
SONS IN POVERTY:	334,871	184,115	52,713	3,514	13,495	81,034	**	175,167
CENT OF TOTAL POVERTY:	100.00	54.98	15.74	1.05	4.03	24.20	**	52.49

	TOTAL	ADULTS (22 +)	YOUTH (16-22)	**	SCHOOL DROPOUTS	AFDC REGISTRANTS
ECONOMICALLY DISADVANTAGED	558,321	282,338	71,686	**	117,392	57,91[illegible]
PERCENT OF DISADVANTAGED	100.00	50.57	12.84	**		

NOMICALLY DISADVANTAGED YOUTH AS %
ECONOMICALLY DISADVANTAGED ADULT: 25.39

ADJUSTED PERCENT OF FUNDS TO
ECONOMICALLY DISADVANTAGED YOUTH: 44.29

AVERAGE WEEKLY
WAGE FOR AREA: $314

FAMILY STATUS

SINGLE MOTHER W/ CHILD .... (YOUNGEST CHILD UNDER 6 YEARS OLD)	14,433
SINGLE MOTHER W/ CHILD .... (YOUNGEST CHILD OVER 6 YEARS OLD)	12,679

OTHER BARRIERS

LIMITED ENGLISH LANGUAGE PROFICIENCY	196,896
HANDICAPPED	139,879
OFFENDERS	24,504
VETERANS	307,408

EMPLOYMENT STATUS

EMPLOYED	1,187,875
UNEMPLOYED	121,488
NOT IN LABOR FORCE	796,608
UNEMPLOYMENT RATE	9.28
UI RECIPIENTS	199,795
-- SHORT TERM .... (1-14 OF PREVIOUS 26 WEEKS)	129,895
-- LONG TERM .... (15 OR MORE OF PREVIOUS 26 WEEKS)	69,890
-- EXHAUSTS	31,208
PUBLIC ASSISTANCE RECIPIENTS	68,976

OURCE: EMPLOYMENT DEVELOPMENT DEPARTMENT, EMPLOYMENT DATA AND RESEARCH DIVISON, LABOR MARKET INFORMATION SECTION

(1): FOR ADDITIONAL INFORMATION CONCERNING DEFINITIONS AND DATA REFERENCE PERIODS, CONTACT LOCAL LABOR MARKET ANALYSTS, EMPLOYMENT DEVELOPMENT DEPARTMENT, EMPLOYMENT DATA AND RESEARCH DIVISION, AREA LABOR MARKET INFORMATION GROUPS.

[illegible] CENSUS. DATA DO NOT RELATE DIRECTLY TO ECONOMICALLY DISADVANTAGED [illegible] LEVELS OF SERVICE

ATTACHMENT A

APPROVED GR-EMPLOYABLE CASELOAD
May 1983

DPSS DISTRICT	GR-E CASES
Compton	857
Long Beach Spec. Aids	602
Glendale	37
Lancaster	167
Pasadena	275
West Valley	95
Civic Center	2,207
Metro East	738
Metro Spec Aids	1,031
Florence	671
South Central	801
Southwest Spec. Aids	867
Cudahy	239
Lincoln Heights	106
Pomona	282
San Gabriel Valley	146
Echo Park	765
Rancho Park	646
Total	10,532

Research & Statistical Services Section
July 11, 1983

ATTACHMENT A

CHARACTERISTICS OF EMPLOYABLE GENERAL RELIEF RECIPIENTS

Gender: Male 72% Female 28%

Average Age: 37.1 years

Ethnicity:

White	Hispanic	Black	Asian	Other
21%	21%	49%	8%	1%

Primary Language:

English	88%
Spanish	9%
Other	3%
Total	100%

Average Time On Aid: 5.6 months

Education:

Average years of schooling	11.1 years	
High School graduate:	Yes 59%	No 41%
Prior vocational training:	Yes 23%	No 77%

Means of Transportation:

Public	92%
Private	8%

Former Occupation:

Unskilled labor	39%
Clerical	17%
Assembly	8%
Skilled labor	7%
Trades	5%
Other	12%
Never employed	12%
Total	100%

Chart CII

JTPA TRAINING SERVICES PLAN
(SUGGESTED)

Program Categories	2 Total Dollars Targeted	3 Planned Number of Participants	4 Planned Length of Training	5 Planned Cost Per Participant	6 Expected Outcome and Comments
Classroom Training (Remedial/Basic)					
Classroom Training (Occupational)	$4,054,039	5,800	20 weeks	$699*	
On-The-Job Training	978,553	1,400	20 Weeks	699*	
Other Employer Based Trn'g. (JTPA §204 #s6,7,12,24,28					
Work Experience	1,957,100	2,800	20 Weeks	699*	
Exemplary Youth Programs	5,491,883	1,760	20 Weeks	3,120	
Services to Participants					
Services to Employers					
Other Activities					
Total	$12,481,553	11,760	20 Weeks	$1,061	

*These costs only include the JTPA allocation. Additional resources from County General Funds will be used to augment remaining participant costs needed to complete the planned length of training.

PERFORMANCE OBJECTIVES
Title IIA

e Delivery Area COUNTY OF LOS ANGELES
: October 1, 1983 to June 30, 1984

Adult Objectives	National Standards	To Be Completed by SDA Pursuant to DOL Standards and Guidelines	
		Variance Factor	SDA Planned Objectives
Entered Employment Rate—Number of adults who enter employment as a percentage of the number of adults who terminate.	[illegible].4% (proposed)	-18.00	38.59%
Cost per entered Employment—Total expenditures for adults divided by the number of adults who enter employment.	$7,172.22 (proposed)	1,532.39	$ 7,998.75
Average Wage at Placement—Average wage for all adults who enter employment at the time of termination.	$4.39 per hour (proposed)	.14	4.53
Welfare Entered Employment Rate—Number of adult welfare recipients who enter employment at termination as a percentage of the number of adult welfare recipients who terminate.	Determined by SDA (See Guidelines)	N/A	22.4%
Youth Objectives			
Entered Employment Rate—Number of youth who enter employment at termination as a percentage of the number of youth who terminate.	28.7% (proposed)	5.6	34.02%
Positive Termination Rate—Number of youth having a positive termination (entered employment plus employability enhancement terminations) as a percentage of the total number of youth who terminate.	76.7% (proposed)	-9.73	66.85%
Cost Per Positive Termination—Total expenditures for youth divided by the number of youth having a positive termination.	$4,351.50 (proposed)	857.39	$ 4,599.38

1981-83 REVISION

July 15, 1983

Chart CIII

PERFORMANCE OBJECTIVES
Title IIA

REVISED [illegible]-10-83

ice Delivery Area COUNTY OF LOS ANGELES
riod: October 1, 1983 to June 30, 1984

Adult Objectives	National Standards	To Be Completed by SDA Pursuant to DOL Standards and Guidelines	
		Variance Factor	SDA Planned Objectives
1. Entered Employment Rate--Number of adults who enter employment as a percentage of the number of adults who terminate.	50.4% (proposed)	-18.00	32.4%
2. Cost per entered Employment--Total expenditures for adults divided by the number of adults who enter employment.	$7,172.22 (proposed)	1,532.39	$ 8,704.61
3. Average Wage at Placement--Average wage for all adults who enter employment at the time of termination.	$4.39 per hour (proposed)	.14	4.52
Welfare Entered Employment Rate--Number of adult welfare recipients who enter employment at termination as a percentage of the number of adult welfare recipients who terminate.	Determined by SDA (See Guidelines)	N/A	22.4%
Youth Objectives			
1. Entered Employment Rate--Number of youth who enter employment at termination as a percentage of the number of youth who terminate.	28.7% (proposed)	5.6	34.3
2. Positive Termination Rate--Number of youth having a positive termination (entered employment plus employability enhancement terminations) as a percentage of the total number of youth who terminate.	76.7% (proposed)	-9.73	67.0%
3. Cost Per Positive Termination--Total expenditures for youth divided by the number of youth having a positive termination.	$4,351.50 (proposed)	857.39	$ 5,208.89

July 15, 1983

PARTICIPANT PROGRAM PLAN

SELECTED STATISTICS

		10/21/83 REV		ORIG.#&%		ED&R
1.	TOTAL PARTICIPANTS	11,760	100%			Econ. Dis.
	Adults	10,000	85%	same		50.57%
	Youth	1,760	15%	same		12.64%
						Poverty
2.	Males	8,027	68%	7644	65%	-
	Females	3,733	32%	4116	35%	-
3.	White (Non-Hispanic)	1,652	14%	2787	24%	54.98%
4.	Black	3,004	25%	5111	43%	13.74%
5.	Hispanic	6,115	51%	2374	25%	52.49%

SERVICE PARITY

School Dropouts	2,576	22%	same		21%
AFDC Registrants	1,176	10%	746	6%	10%
Handicapped	823	7%	same		
U.I. Claimant	387	3%	same		
Veterans	2,018	17%	same		

Service [illegible]

Modification No.

Funding Title

Participant Program Plan

	Planned Enrollments		Planned Terminations				Total		
			Adult		Youth			Adult	Youth
	Number	% of Total	Number	% of Total	Number	% of Total	Number	% of Total	% of Total
I. Client Characteristics									
A. Total Participants	11760	100%	9000	100%	1584	100%	10584	85	15
B. Male	8027	68	6480	72	744	47	7224	90	10
C. Female	3733	32	2520	28	840	53	3360	75	25
D. 14-15 Year Olds	-0-	-0-	☒	☒	-0-	-0-	-0-	☒	-0-
E. 16-19 Year Olds	1179	10	☒	☒	1061	67	1061	☒	100
F. 20-21	581	5	☒	☒	523	33	523	☒	100
G. 22-44	8225	69.90	7403	82	☒	☒	7403	100	☒
H. 45-54	570	4.85	513	6	☒	☒	513	100	☒
I. 55 and Over	1205	10.25	1085	12	☒	☒	1085	100	☒
J. White (Non-Hispanic)	1652	14	1114	12	373	24	1487	75	25
K. Black (Non-Hispanic)	3004	26	2585	29	119	8	2704	96	4
L. Asian/Pacific Islander	870	7	720	8	63	4	783	92	8
M. American Indian/Alaskan Native	118	1	90	1	16	1	106	85	15
N. Hispanic	6115	52	[illegible]	57	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	☒	☒	☒	☒	☒	☒	☒	☒	☒
II. Service Parity									
A. School Dropouts	2576	22	1890	21	428	27	2318	82	18
B. AFDC Registrants	1176	10	284	3	774	49	1058	27	73

NOTE: The "other" racial/ethnicity group in the planning information provided by EDD represents individuals who declined to state race/ethnicity during the 1980 census. For planning purposes they are to be distributed among the four racial/ethnic groups in proportion to each group's incidence in the local population.

REVISED 10-21-83

Exh [illegible]

Service Delivery Area ____________

Registration No. ____________

Modification No. ____________

Funding Title ____________

Participant Program Plan

	Planned Enrollments		Planned Terminations				Total		
			Adult		Youth			Adult	Youth
I. Client Characteristics	Number	% of Total	Number	% of Total	Number	% of Total	Number	% of Total	% of Total
A. Total Participants	11760	100%	9000	100%	1584	100%	10584	85	15
B. Male	7644	65	6480	72	744	47	7224	90	10
C. Female	4116	35	2520	29	840	53	3360	75	25
D. 14-15 Year Olds	-0-	-0-	☒	☒	-0-	-0-	-0-	☒	-0-
E. 16-19 Year Olds	1179	10	☒	☒	1067	67	1067	☒	100
F. 20-21	581	5	☒	☒	523	33	523	☒	100
G. 22-44	8700	74	7830	87	☒	☒	7830	100	☒
H. 45-54	600	5	540	6	☒	☒	540	100	☒
I. 55 and Over	720	6	630	7	☒	☒	630	100	☒
J. White (Non-Hispanic)	2787	24	1890	21	618	39	2508	75	25
K. Black (Non-Hispanic)	5111	43	4410	49	190	12	4600	96	4
L. Asian/Pacific Islander	870	7	720	8	63	4	783	92	8
M. American Indian/Alaskan Native	118	1	90	1	16	1	106	85	15
N. Hispanic	2874	25	1890	21	697	44	2587	73	27
	☒	☒	☒	☒	☒	☒	☒	☒	☒
II. Service Parity									
A. School Dropouts	2576	22	1390	21	429	27	2319	82	18
B. AFDC Registrants	746	6	180	2	491	31	671	27	73

NOTE: The "other" racial/ethnicity group in the planning information provided by ED&R represents individuals who declined to state race/ethnicity during the 1980 census. For planning purposes they are to be distributed among the four racial/ethnic groups in proportion to each group's incidence in the local population.

Rev. August 5, 1983

	Planned Enrollments		Planned Terminat.				Total		
			Adult		Youth			Adult	Youth
	Number	% of Total	Number	% of Total	Number	% of Total	Number	% of Total	% of Total
III. Other Substantial Segments									
A. Handicapped	823	7	630	7	111	7	741	85	15
B. Unemployment Insurance Claimant	387	3	-0-	-0-	348	22	348	-0-	100
C. Veterans	2018	17	1800	20	16	1	1816	99	1
D.									
E.									
F.									
G.									
H.									
I.									
J.									
K.									
L.									
IV. Termination Data									
A. Entered Unsubsidized Employment			2880	32	540	34	3420	84	16
B. Youth Employability Enhancement Term					523	33	523		100
C. Other Terminations			6120	68	521	33	6641	92	8
D. Average Hours of Training			20		20		20		
E. Average Wage at Placement			4.53		NA		4.53		

1181-83 REVISION

REVISED 10-21-83

	Planned Enrollments		Planned Terminations				Total		
			Adult		Youth			Adult	Youth
III. Other Substantial Segments	Number	$ of Total	Number	$ of Total	Number	$ of Total	Number	$ of Total	$ of Total
A. Handicapped	823	7	630	7	111	7	741	85	15
B. Unemployment Insurance Claimant	387	3	-0-	-0-	348	22	348	-0-	100
C. Veterans	2018	17	1800	20	16	1	1816	99	1
D.									
E.									
F.									
G.									
H.									
I.									
J.									
K.									
L.									
IV. Termination Date									
A. Entered Unsubsidized Employment			2880	32	540	34	3420	84	16
B. Youth Employability Enhancement Term					523	33	523		100
C. Other Terminations			6120	68	521	33	6641	92	8
D. Average weeks of Training			20		20		20		
E. Average Wage at Placement			452		NA		4.52		

Rev. August 5, 1983

REVISED 10-21

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name: COUNTY OF ANGELES

B. SDA NUMBER

Performance Period

Type of Standard: Plan / Recalculated

Date Calculated

PERFORMANCE MEASURE: A. Average Wage at Placement (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE	J. WEIGHTS	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	28.0	51.7	-23.7	-.002	.0474
2. % 45-54 years old	4.85	4.5	.35	.001	.0004
3. % 55 years old & over	10.25	2.2	8.05	-.015	-.1208
4. % Black	26	29.9	3.09	-.003	.0117
5. % Hispanic	52	9.4	42.06	.000	.0117
6. % Other minority	9.0	4.9	4.1	.007	.0287
7. % Dropout	21.0	30.2	-9.2	-.007	.0644
8. % Handicapped	7.0	10.1	-3.1	.003	-.0093
9. % UI claimant	0.0	7.0	-7.0	.007	.04[illegible]0
10. % Welfare recipient	90.0	30.7	59.3	.001	.0593
11. Average wage for area (000)	16.3	15.3	1.0	.109	.1090
				TOTAL →	.1418

National Departure Point (National Average Performance Level)	4.39	
Model-Adjusted Performance Standard	4.53	
Tolerance Limits	(+) 4 (-) 6	
Governor's Adjustment Factor	( ) 2 pts./l	HD/SA/97 58-15-01

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name: COUNTY OF ANGELES

B. SDA NUMBER:

Performance Period: Y

D. TYPE OF Standard: ( ) Plan ( ) Recalculated

DATE Calculated: ________

E. PERFORMANCE MEASURE: A Average Wage at Placement (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female	28.0	51.7	-23.7	-.002	.0474
2. % 45-54 years old	7.0	4.5	2.5	.001	.0025
3. % 55 years old & over	6.0	2.2	3.8	-.015	-.0570
4. % Black	49.0	29.9	19.1	-.003	.0573
5. % Hispanic	21.0	9.4	11.6	.000	.0
6. % Other minority	9.0	4.9	4.1	.007	.0287
7. % Dropout	21.0	30.2	- 9.2	-.007	.0644
8. % Handicapped	7.0	10.1	3.1	.003	.0093
9. % UI claimant	0.0	7.0	7.0	.007	.0490
10. % Welfare recipient	90.0	30.7	59.3	.001	.0593
11. Average wage for area (000)	16.3	15.3	1.0	.109	.1090
				TOTAL	.1387

National Departure Point (National Average Performance Level)	$4.39		
Model-Adjusted Performance Standard	4.52		
Parameters Limits	(+) 4 (-) 6		
Governor's Adjustment Factor	( ) 2 pts.7%		
SDA Performance Standard			

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

Performance Period PY ______	B. TYPE OF Standard ( ) Plan ( ) Recalculated	DATE Calculated ______	A. Service Delivery Area's Name COUNTY OF LOS ANGELES	B. SDA NUMBER
			E. PERFORMANCE MEASURE A Cost per Entered Employment (Adult)	

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	28.0	51.7	- 23.7	22.04	- 522.3
2. % 45-54 years old	4.85	4.5	.35	96.66	33.8
3. % 55 years old & over	10.25	2.2	8.05	-78.39	-631.0
4. % Black	26	29.9	- 3.9	4.19	- 16.3
5. % Hispanic	52	9.4	42.6	-2.21	-94.1
6. % Other minority	9.0	4.9	4.1	-20.12	- 82.4
7. % Dropout	21.0	30.2	- 9.2	17.73	- 163.1
8. % Handicapped	7.0	10.1	- 3.1	9.00	- 27.9
9. % UI claimant	0.0	7.0	- 7.0	-.66	4.6
10. % Welfare recipient	90.0	30.7	59.3	49.43	2,931.2
11. Average wage for area (000)	16.3	15.3	1.0	366.99	366.9
12. Unemployment rate	9.3	9.0	0.3	323.27	96.9
13. Average weeks participated	20.0	29.5	- 9.5	112.60	- 1,069.7
				TOTAL →	826.53

L. National Departure Point (National Average Performance Level)	$7,172.22	M.	
N. Model-Adjusted Performance Standard	7,998.75		
N. Parameters Limits	(+) 20 (-) 25		
O. Governor's Adjustment Factor	X pts./% ( )		
* Performance Standard			

US DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name: COUNTY OF LOS ANGELES

B. SDA Number

C. Performance Period Y ______

D. Type of Standard ☐ Plan ☐ Recalculated

Date Calculated ______ ______

E. Performance Measure: A Cost per Entered Employment (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I x J)
1. % Female	28.0	51.7	-23.7	22.04	- 522.35
2. % 45-54 years old	7.0	4.5	2.5	96.66	241.65
3. % 55 years old & over	6.0	2.2	3.8	-78.39	297.88
4. % Black	49.0	29.9	19.1	4.19	80.03
5. % Hispanic	21.0	9.4	11.6	-2.21	25.64
6. % Other minority	9.0	4.9	4.1	-20.12	- 82.49
7. % Dropout	21.0	30.2	- 9.2	17.73	- 163.12
8. % Handicapped	7.0	10.1	- 3.1	9.00	- 27.90
9. % UI claimant	0.0	7.0	- 7.0	-.66	4.62
10. % Welfare recipient	90.0	30.7	59.3	49.43	2,931.20
11. Average wage for area (000)	16.3	15.3	1.0	366.99	366.99
12. Unemployment rate	9.3	9.0	0.3	323.27	96.98
13. Average weeks participated	20.0	29.5	- 95	112.60	- 1,069.70
				TOTAL	1,532.39

National Departure Point (National Average Performance Level)	$7,172.22	m	
Model-Adjusted Performance Standard	6,704.61		
Parameters Limits	(+) 20 (-) 25		
Governor's Adjustment Factor	( ) % pts./$		
SDA Performance Standard			

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name: COUNTY OF LOS ANGELES

B. SDA Number:

C. Performance Period PY

D. Type of Standard ( ) Plan ( ) Recalculated

Date Calculated

E. Performance Measure: A. Entered Employment Rate (Adult)

F. Local Factors	G. SDA Factor Values	H. Natl. Avg. Factor Values	I. Difference (G minus H)	J. Weights	K. Effect of Local Factors on Performance Expectations (I x J)
1. % Female	28.0	51.7	-23.7	.03	- .71
2. % 45-54 years old	4.85	4.5	.35	-.56	- .196
3. % 55 years old & over	10.25	2.2	8.05	.21	1.69
4. % Black	26	29.5	3.09	-.07	+.273
5. % Hispanic	52	9.4	42.06	.08	3.400
6. % Other minority	9.0	4.9	4.1	.18	.74
7. % Dropout	21.0	30.2	-9.2	-.08	.74
8. % Handicapped	7.0	10.1	-3.1	-.20	.62
9. % UI claimant	0.0	7.0	-7.0	.26	- 1.82
10. % Welfare recipient	90.0	30.7	59.3	-.26	- 15.42
11. Average wage for area (000)	16.3	15.3	1.0	-.60	- .60
12. Unemployment rate	9.3	9.0	0.3	-1.53	- .46
				TOTAL	-11.015

L. National Departure Point (National Average Performance Level) 50.48

M. Model-Adjusted Performance Standard 38.598

N. Parameters Limits (+) 11 (-) 17

Governor's Adjustment Factor ( ) 2 pts./%

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name: COUNTY OF LOS ANGELES	B. SDA Number:
Performance Period: Y ______	B. Type of Standard: 1) Plan 2) Recalculated
Date Calculated: ______	C. Performance Measure: A Entered Employment Rate (Adult)

D. LOCAL FACTORS	A. SDA Factor Values	B. NAT'L AVG FACTOR VALUES	C. DIFFERENCE (A minus B)	D. WEIGHTS*	E. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (C x D)
1. % Female	28.0	51.7	-23.7	.03	- .71
2. % 45-54 years old	7.0	4.5	2.5	-.56	- 1.40
3. % 55 years old & over	6.0	2.2	3.8	.21	.80
4. % Black	49.0	29.9	19.1	-.07	- 1.34
5. % Hispanic	21.0	9.4	11.6	.08	.93
6. % Other minority	9.0	4.9	4.1	.18	.74
7. % Dropout	21.0	30.2	9.2	-.08	.74
8. % Handicapped	7.0	10.1	3.1	-.20	.62
9. % UI claimant	0.0	7.0	7.0	.26	- 1.82
10. % Welfare recipient	90.0	30.7	59.3	-.26	- 15.42
11. Average wage for area (000)	16.3	15.3	1.0	-.60	- .60
12. Unemployment rate	9.3	9.0	0.3	-1.53	- .46
				TOTAL →	- 18.00

National Departure Point (National Average Performance Level)	50.48	H
Model-Adjusted Performance Standard	32.48	
Parameters Limits	(+) 13 (-) 17 %	
Governor's Adjustment Factor	( ) % pts./%	
SDA Performance Standard		

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name	COUNTY OF LOS ANGELES
B. SDA Number	
C. Performance Period	
D. Type of Standard	☐ Plan ☐ Recalculated
Date Calculated	
E. Performance Measure	A Cost per Positive Termination (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTORS ON PERFORMANCE EXPECTATIONS
1. % Female	52.7	47.2	5.5	-12.13	-66.72
2. % 14-15 years old	0	6.9	- 6.9	-57.02	93.44
3. % 16-19 years old	67.0	81.0	-14.0	-42.85	599.90
4. % Black	0	33.7	-25.7-	-9.55	245.44
5. % Hispanic	52	10.9	41.10	-1.73	-71.10
6. % Other minority	5.0	3.9	1.1	-40.97	-45.07
7. % Dropout	26.5	23.7	2.8	49.49	138. 7
8. % UI claimant	1.0*	1.0	-0-	-44.45	-0-
9. % Welfare recipient	31.1	32.1	-1.0	5.00	- 5.0
10. Average wage for area (000)	16.3	15.3	1.0	208.04	208.04
11. Unemployment rate	17.7	9.0	8.7	87.04	757.25
12. Average weeks participated	20	39.2	-19.2	83.75	-12.08
				TOTAL →	246.88

National Departure Point (National Average Performance/Level)	$4,351.50	
Model-Adjusted Performance Std.	$4,598.38	
Parameters Limits	(+) 30 (-) 31	
Governor's Adjustment Factor	( ) % pts./$	
Performance Standard	*Local SDA data base was not accurate to [illegible] computation of this factor	

07

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

Performance Period	d. TYPE OF Standard ☐ Plan ☐ Recalculated	DATE Calculated ______	a. Service Delivery Area's Name: COUNTY OF LOS ANGELES
			b. SDA NUMBER
			e. PERFORMANCE MEASURE: A Cost per Positive Termination (Youth)

f. LOCAL FACTORS	g. SDA Factor Values	h. NAT'L AVG FACTOR VALUES	i. DIFFERENCE (g minus h)	j. WEIGHTS	k. EFFECT OF LOCAL FACTOR ON PERFORM. EXPECTATIONS
1. % Female	52.7	47.2	5.5	-12.13	- 66.72
2. % 14-15 years old	0	6.9	- 6.9	-57.02	93.44
3. % 16-19 years old	67.0	81.0	14.0	-42.85	599.90
4. % Black	12.0	33.7	-21.7	-9.55	207.24
5. % Hispanic	44.0	10.9	33.1	-1.73	- 57.26
6. % Other minority	5.0	3.9	1.1	-40.97	- 45.07
7. % Dropout	26.5	23.7	2.8	49.49	138.7
8. % UI claimant	1.0*	1.0	-0-	-44.45	-0-
9. % Welfare recipient	31.1	32.1	1.0	5.00	- 5.0
10. Average wage for area (000)	16.3	15.3	1.0	208.04	208.04
11. Unemployment rate	17.7	9.0	8.7	87.04	757.25
12. Average weeks participated	24.0	39.2	15.2	83.75	-1273.00
				TOTAL ►	+857.39

National Departure Point (National Average Performance Level)	$4,351.50	
Model-Adjusted Performance Std.	$5,208.89	
Parameters Limits	(+) 38 (-) 31	
Governor's Adjustment Factor	% pts./$ ( )	
SDA Performance Standard		

*Local SDA data base was not accurate to estimate computation of this factor. National average was utilized instead.

U S DEPARTMENT OF LABOR • Employment and Training Administration **JTPA Performance Standards Worksheet**	A. Service Delivery Area's Name COUNTY OF LOS ANGELES	B. SDA Number
C. Performance Period PY ____	D. Type of Standard ☐ Plan ☐ Recalculated	Date Calculated ____
E. Performance Measure A. Positive Termination Rate (Youth)		

F. Local Factors	G. SDA Factor Values	H. Natl Avg. Factor Values	I. Difference (G minus H)	J. Weights	K. Effect of Local Factor on Performance Expectations (I × J)
1. % Female	52.7	47.2	5.5	.18	.99
2. % 14-15 years old	0	6.9	- 6.9	.25	- 1.73
3. % 16-19 years old	67.0	81.0	-14.0	.21	- 2.94
4. % Black	8	33.7	-25.7	.03	- .771
5. % Hispanic	52	10.9	41.10	.00	0
6. % Other minority	5.0	3.9	1.1	.32	0.35
7. % Dropout	26.5	23.7	2.8	-.27	- 0.76
8. % UI claimant	1.0*	1.0	0	.77	0
9. % Welfare recipient	31.1	32.1	- 1.0	-.13	0.13
10. Average wage for area (000)	16.3	15.3	1.0	-.68	- 0.68
11. Unemployment rate	17.7	9.0	8.7	-.51	- 4.44
				TOTAL	-9.85

L. National Departure Point (National Average Performance Level)	76.7%	M.	
N. Model-Adjusted Performance Standard	66.85%		
O. Parameters Limits	(+) 11 (-) 10		
P. Governor's Adjustment Factor	( ) 1 pts.7%		

* ...is not accurate to estimate.

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

C. Performance Period FY ______	D. TYPE OF Standard ( ) Plan ( ) Recalculated	DATE Calculated __________	E. PERFORMANCE MEASURE A. Positive Termination Rate (Youth)

A. Service Delivery Area's Name: COUNTY OF LOS ANGELES

B. SDA NUMBER

F. LOCAL FACTORS	G. SDA Factor Values	H. NAT'L AVG FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I x J)
1. % Female	52.7	47.2	5.5	.18	.99
2. % 14-15 years old	0	6.9	- 6.9	.25	- 1.73
3. % 16-19 years old	67.0	81.0	-14.0	.21	- 2.94
4. % Black	12.0	33.7	-21.7	.03	- 0.65
5. % Hispanic	44.0	10.9	11.1	.00	0
6. % Other minority	5.0	3.9	1.1	.32	0.35
7. % Dropout	26.5	23.7	2.8	-.27	- 0.76
8. % UI claimant	1.0*	1.0	0	.77	0
9. % Welfare recipient	31.1	32.1	1.0	-.13	0.13
10. Average wage for area (000)	16.3	15.3	1.0	-.68	0.68
11. Unemployment rate	17.7	9.0	8.7	-.51	4.44
				TOTAL →	- 9.73

L. National Departure Point (National Average Performance Level)	76.7%	
M. Model-Adjusted Performance Standard	67.0%	
N. Parameters Limits	(+) 11 (-) 10 %	
O. Governor's Adjustment Factor	% pts./$ ( )	
P. SDA Performance Standard	*Local SDA data base was not accurate to estimate computation of this factor. National average was	

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area: COUNTY OF LOS ANGELES

Performance Period	B. Type of Standard [ ] Plan [ ] Recalculated	Date Calculated	E. Performance Measure A. Entered Employment Rate (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	52.7	47.2	5.5	.07	.39
2. % 14-15 years old	0.0	6.9	-6.9	-.66	4.55
3. % 16-19 years old	67.0	81.0	-14.0	-.43	6.02
4. % Black	8	33.7	-25.7	-.02	.514
5. % Hispanic	52	10.9	41.1	-.05	-2.055
6. % Other minority	5.0	3.9	1.1	-.01	-0.01
7. % Dropout	26.5	23.7	2.8	.02	0.06
8. % UI claimant	1.0	1.0	-0-	.62	-0-
9. % Welfare recipient	31.1	32.1	-1.0	-.18	0.18
10. Average wage for area (000)	16.3	15.3	1.0	.02	0.02
11. Unemployment rate	17.7	9.0	8.7	-.50	-4.35
				TOTAL	5.319

L. National Departure Point (National Average Performance Level)	28.71		
M. Model-Adjusted Performance Standard	34.029		
N. Parameters Limits	(+) 28 (-) 50		
O. Governor's Adjustment Factor	X pts./% ( )		
Performance Standard	( )	*Local SDA data base was not accurate to estimate computation of this factor. National average was utilized instead.	

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

Performance Period	B. TYPE OF Standard ( ) Plan ( ) Recalculated	DATE Calculated	A. Service Delivery Area's Name COUNTY OF LOS ANGELES
			E. PERFORMANCE MEASURE A Entered Employment Rate (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL AVG FACTOR VALUES	I. DIFFERENCE	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	52.7	47.2	5.5	.07	.39
2. % 14-15 years old	0.0	6.9	- 6.9	-.66	4.55
3. % 16-19 years old	67.0	81.0	-14.0	-.43	6.02
4. % Black	12.0	33.7	-21.7	-.02	0.43
5. % Hispanic	44.0	10.9	33.1	-.05	- 1.66
6. % Other minority	5.0	3.9	1.1	-.01	- 0.01
7. % Dropout	26.5	23.7	2.8	.02	0.06
8. % UI claimant	* 1.0	1.0	-0-	.12	-0-
9. % Welfare recipient	31.1	32.1	- 1.0	-.18	0.18
10. Average wage for area (000)	16.3	15.3	1.0	.02	0.02
11. Unemployment rate	17.7	9.0	8.7	-.50	- 4.35
				TOTAL ▶	5.63

L National Departure Point (National Average Performance Level)	28.71	Q	
M Model-Adjusted Performance Standard	34.33%		
N Parameters Limits	(+) 28 (-) 50		
O Governor's Adjustment Factor	2 pts./% ( )		
P SDA Performance Standard	*Local SDA data base was not accurate to estimate computation of this factor. National average was utilized instead. ( )		

Department of Labor, Employment and Training Administration JTPA Performance Standards Worksheet			A. Service Delivery Area's Name COUNTY OF LOS ANGELES	B. SDA Num
formance Period	D. Type of Standard ☐ Plan ☐ Recalculated	Date Calculated ______	E. Performance Measure Welfare Entered Employment Rate (Adu	

Model-Adjusted Performance Standard for the Adult Entered Employment Rate 38.59%

SDA (State) Welfare Entered Employment Rate Ratio .75

Welfare Entered Employment Rate 22.4%

Model-Adjusted Performance Standard 27.4%

Parameters Limits (+) [ ] (-) [ ] % pts./%

Governor's Adjustment Factor [ ]

SDA Performance Standard /

809

Department of Labor.Employment and Training Administration TPA Performance Standards Worksheet			A. Service Delivery Area's Name COUNTY OF LOS ANGELES	B. SDA Number
formance Period ________	D. Type of Standard ☐ Plan ☐ Recalculated	Date Calculated ______	E. Performance Measure Welfare Entered Employment Rate (Adult)	

Model-Adjusted Performance Standard for the Adult Entered Employment Rate 32.4%

SDA (State) Welfare Entered Employment Rate Ratio .75

Welfare Entered Employment Rate 22.4%

Model-Adjusted Performance Standard 22.4%

Parameters Limits (+) ( )
(-) 17 %
% pts./%

Governor's Adjustment Factor ( )

SDA Performance Standard ________

Exhibit E

BUDGET

County of Los Angeles
Service Delivery Area

TITLE IIA FUNDING

1. Base Allocation	12,481,553
2. Additional Funds (Identify sources)	-0-
3. Decrease in funding	-0-
Net Funds Available	12,481,553

Plan Registration No.

Modification No.

PLANNED COSTS

Limitation on cost categories

a. Training costs must be at least 70% of total allocation.

b. Total Participant Support costs and Administration costs may not exceed 30% of total allocation.

c. Administration costs may not exceed 15% of total allocation.

1. Training Funds	8,737,087
2. Participant Support Funds	1,872,233
3. Administration funds	1,872,233
Total Allocations	12,481,553

(1 + 2 + 3 must equal Total Allocation)

[illegible]

TRAINING

CUMULATIVE BUDGET SUMMARY

CHART RI

Total Allocation 8,737,087

First Year Planned Expenditure $12,481,553

Activity	First Quarter 12/	Second Quarter 3/	Third Quarter 6/	Fourth Quarter 9/
1 CLASSROOM TRAINING (REMEDIAL/BASIC)	436,855	655,282	873,709	
2 CLASSROOM TRAINING (OCCUPATIONAL)	1,943,128	2,914,692	3,886,256	
3 ON-THE-JOB TRAINING	534.710	802,065	1,069,420	
4 OTHER EMPLOYER BASED TRN'G. (JTPA S204 #6,7,12,24,28)	-0-	-0-	-0-	
5 Work Experience (50%)	684,980	102,748	1,369,975	
6 Exemplary Youth Programs	512,576	1,025,151	1,537,727*	
7 Training-Related Participant Services	-0-	-0-	-0-	
8 Training-Related Employer Services	-0-	-0-	-0-	
9 Total Obligation	4,112,257	5,499,938	8,737,087	
A. PERFORMANCE BASED CONTRACTS	3,599,680	5,399,520	7,199,360	

* This figure represents a maximum amount which may be spent for exemplary youth programs. Since the County will emphasize services to 18-21 year old youth, this figure may be reduced accordingly.

July 15, 1983

GENERAL PROGRAM

CUMULATIVE BUDGET SUMMARY

CHART XII

Total Allocation $12,481,553

First Year Planned Expenditure $12,481,553

Activity	First Quarter 12/	Second Quarter 3/	Third Quarter 6/	Fourth Quarter 9/
1 ADMINISTRATION Total Obligation	624,078	1,248,155	1,872,233	-0-
2 PARTICIPANT SUPPORT TOTAL OBLIGATION	936,117	1,404,175	1,872,233	-0-
3 TRAINING TOTAL OBLIGATION (LINE 10, chart XI)	4,112,257	5,499,938	8,737,087	-0-
4 PROGRAM TOTAL OBLIGATION (1, 2, AND 3)	5,672,452	8,152,268	12,481,553	-0-

BUDGET CONTROL CHART XIII

	Amount	Percent
Adult Services	6,989,670	56%
Youth Services	5,491,883	44%
Total	12,481,553	100%

July 15, 1983

*0006

AGREEMENT BETWEEN THE BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES AND THE PRIVATE INDUSTRY COUNCIL

This agreement made and entered into by and between the County of Los Angeles and the Private Industry Council.

WITNESSETH:

WHEREAS, the Job Training Partnership Act (29 U.S.C. 1501 et. seq., Public Law 97-300, 96 Stat. 1322) authorizes the expenditure of federal funds for job training programs in established Service Delivery Areas (SDA's); and

WHEREAS, the County of Los Angeles has been designated as an SDA for its unincorporated areas and certain of its cities; and

WHEREAS, the Board of Supervisors are the Chief Elected Officials of such SDA; and

WHEREAS, the Job Training Partnership Act establishes the Private Industry Council and the Chief Elected Officials as local participants in the implementation of the Job Training Partnership Act; and

WHEREAS, the parties desire to enter into an agreement to provide job training and job placement services to the eligible residents of Los Angeles County; and

WHEREAS, the County Department of Community Services has the proven expertise to establish and implement such job training and placement programs:

NOW, THEREFORE, IT IS MUTUALLY AGREED:

1. Purpose

   The purpose of this agreement is to establish a basic framework for the implementation of the Job Training Partnership Act in Los Angeles County during the nine-month transition period established in the Act.

2. Private Industry Council

In partnership with the Board of Supervisors, the Los Angeles County Private Industry Council (PIC) will provide policy guidance and exercise oversight with respect to activities under the County's Job Training Plan.

In carrying out these responsibilities, the PIC will function generally as a Board of Directors, setting policy and standards, then reviewing and evaluating progress toward program goals. Within this focus, the PIC will emphasize the private sector outreach and liaison activities for which it is uniquely qualified.

3. Grant Recipient and Administrative Entity

The Board of Supervisors and the Private Industry Council designate the County of Los Angeles as the JTPA grant recipient and jointly appoint the County Department of Community Services as the administrative entity on behalf of the County and the PIC, for all JTPA programs operated within the County's Service Delivery Area.

4. Development of the Job Training Plan

Pursuant to the provisions of JTPA and in compliance with State and Federal regulations, the Los Angeles County Department of Community Services shall develop the Job Training Plan and contractor funding recommendations for the review and approval of the Private Industry Council and the Board of Supervisors. Upon the approval and signatures of the PIC Chairperson and the Chairman of the Board of Supervisors, the Job Training Plan will be submitted to the Governor for approval.

5. Term of Agreement

The term of the Agreement shall commence on the 20thday of September, 1983, and shall continue in force until June 30, 1984.

3

Amendments

Either PIC or the County may propose amendments to this Agreement at any time during the term of this Agreement, by providing to the other party, a written notice defining the specifics of the proposed amendment(s). All amendments to this Agreement shall require approval by the PIC, and the Board of Supervisors, and must be in written form and executed by the appropriate authorized parties.

IN WITNESS WHEREOF, the Board of Supervisors of the County of Los Angeles has caused this Contract to be subscribed by its Chairman and the seal of said Board to be hereto affixed and attested by the Executive Officer-Clerk of the Board of Supervisors thereof, and the Private Industry Council has subscribed the same through its authorized officer, the day, month, and year first above written.

Carl E. Herman
Chairperson
Private Industry Council

Mike Antonovich
Chairman
Board of Supervisors

ATTESTED:

RICHARD A. SCHOENI,
Assistant Executive Officer
Clerk of the Board of Supervisors

By Patricia Polk
DEPUTY

APPROVED AS TO FORM
JOHN H. LARSON, County Counsel

By Karen A. Lichtenberg

ADOPTED
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

78 SEP 20 1983

Richard A. Schoeni
RICHARD A. SCHOENI
ASSISTANT EXECUTIVE OFFICER

Rev. 8/30/83

CARMEN A. ESTRADA
MELINDA BIRD
Western Center on Law & Poverty, Inc.
3535 West Sixth Street
Los Angeles, California 90020
Telephone: (213) 487-7211

GARY BLASI
BYRON J. GROSS
BRUCE IWASAKI
LEGAL AID FOUNDATION OF LOS ANGELES
1550 W. Eighth Street
Los Angeles, California 90017

Telephone: (213) 487-3320

LINDA RUTH BEECHER
LEGAL AID FOUNDATION OF LOS ANGELES
8601 S. Broadway Street
Los Angeles, California 90003

Telephone: (213) 971-4102

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

EDWARD VENZOR, JERRY SMITH, ROSS ROMERO, and RAMON PADILLA,

Plaintiffs,

-vs-

EDDY TANAKA, Director of the Los Angeles County Department of Public Social Services; BOARD OF SUPERVISORS OF THE COUNTY OF LOS ANGELES AND THE INDIVIDUAL MEMBERS THEREOF, DONALD GALLOWAY, Director of the Los Angeles County Department of Community Services, LOS ANGELES COUNTY PRIVATE INDUSTRY COUNCIL,

Defendant(s).

Case Number: C470221

FIRST AMENDED COMPLAINT
FOR INJUNCTIVE RELIEF

PRELIMINARY STATEMENT

In this action, plaintiffs seek injunctive relief to prevent Los Angeles County from illegally denying General Relief benefits (GR) to over 14,000 county residents, including 9,000 who have been terminated from aid effective September 30,1983 and 5,000 who have applied for aid in September, 1983 and were found ineligible. These recipients have been refused GR assistance because the County Department of Social Services (DPSS) claims that they are eligible for a monthly job training stipend equal to their GR grant.

In fact, there is no certainty that the job training program will be able to provide subsistence stipends to the thousands who have been referred to it, and the benefits which will be provided at best are not equivalent to those of the GR program. The County job training program is not yet fully implemented or able to provide services to 14,000 people, since the County plan only provides training slots for 9000 adult trainees when the program is fully operational. Because of the abrupt and premature referral of nearly twice that number of trainees, the job training program does not have the fiscal or the administrative capacity to absorb all the ex-GR recipients who have been terminated. Massive confusion and uncertainty has resulted, and the thousands of needy people who previously relied on DPSS for subsistence benefits, clothing and shelter are cut off from this aid in the interim. By the County's own admission, thousands will fall through the cracks and fail to manage the transfer to the new program, and will be without subsistence aid at all.

Those who manage to obtain a job training placement will receive only one half of their stipend at the beginning of the month, and will be unable to pay their monthly rent with the $114.00 which will be provided, as opposed to the full GR grant of $228.00 which they had previously received at the beginning of the month. They will also be without the special allowances for clothing, special diets and emergency rent, foreclosure and utility assistance which were previously available to them in the GR program.

Moreover, the County has not fully disclosed the consequences of referral to the job training program to the recipients whom it terminated and has persuaded recipients to sign a waiver of their hearing rights on the basis of inadequate and incomplete information. In these circumstances, the waivers are invalid and the County's failure to fully disclose the nature and consequences of the job training referral violates the due process rights of recipients to adequate notice of and opportunity to contest their termination.

In summary, DPSS has terminated thousands of GR recipients for placement into a federal job training program that cannot provide job training services to all those referred. As a result, former GR recipients no longer have the due process protections afforded them under the GR program and face an uncertain future regarding receipt of their stipends and the starting dates and locations of their job training. The County's premature action in terminating and refusing the applications of up to 14,000 GR recipients is illegal and must be enjoined. Unless immediate relief is provided by this Court, plaintiffs and other needy County residents will be unable to pay their rent, may not receive their monthly stipend - even if emergency procedures are developed by the County - and face deprivation and eviction from their homes.

PARTIES

1. Plaintiff, EDWARD VENZOR, is a 39 year old resident of Los Angeles County and has been receiving General Relief benefits since June, 1983. He was terminated from the GR Program effective September 30, 1983. He has not yet received a job placement or stipend under the County's job training program. He has lived in Los Angeles County since June, 1983 and during this period has paid taxes in Los Angeles County.

2. Plaintiff, ROSS ROMERO, is a resident of Los Angeles County and was a recipient of General Relief until his termination from the program on September 30, 1983. He has paid taxes in Los Angeles County during his residency within the County.

3. Plaintiff, RAMON PADILLA, is a 57 year old resident of Los Angeles County. He was receiving General Relief assistance until his termination on September 30, 1983. He has paid taxes in Los Angeles County during his residency in the County.

4. Plaintiff, JERRY SMITH, is a 27 year old resident of Los Angeles County. He applied for General Relief in June, 1983, and his application has been pending since then. He has subsisted during the application process on food stamps and on vouchers which can be used to obtain a room in a skid row hotel. He received in the mail warrants from the County for an amount equal to one-half of his GR allotment, plus transportation. He

has not been assigned to a training placement. He has paid taxes which go to the County of Los Angeles in the one year prior to the commencement of this action.

5. Defendant, EDDY TANAKA, is the Director of the Department of Public Social Services (DPSS) of the County of Los Angeles, and, as such, is charged with the responsibility of administering the General Relief program in accordance with state and federal law.

6. Defendant, BOARD OF SUPERVISORS OF LOS ANGELES COUNTY AND THE INDIVIDUAL MEMBERS THEREOF (BOARD), is the governing body of the County of Los Angeles pursuant to California Government Code §25000, et seq., and as such, has the duty of insuring the compliance of the County of Los Angeles with the law and Constitutions of the State of California of the United States.

7. Defendant, DONALD GALLOWAY, is the Director of the Department of Community Services (DCS) of the County of Los Angeles, and, as such, is charged with the responsibility of administering the County's job training program under the Job Training Partnership Act in accordance with state and federal law.

8. Defendant, PRIVATE INDUSTRY COUNCIL OF LOS ANGELES COUNTY (PIC), consists of members appointed pursuant to Cal. Unemployment Ins. C. §15030 et seq., by the Board and is the governing body established to oversee the County's system of job preparation and training services and has the duty of ensuring compliance of the County's job training services with the state and federal law.

STATEMENT OF FACTS

9. Los Angeles County provides support for its indigent residents through the General Relief program, pursuant to the mandate of Welfare and Institutions Code § 17000. On or about September 1, 1983 the Department of Public Social Services (DPSS) issued a directive to terminate employable GR recipients and transfer them to job training administered by DCS (See "DPSS Administrative Directive re Transfer of General Relief Employable Recipients to the Department of Community Services" dated August 29, 1983, and attached here as Exhibit "A"). Additonally, no new GR application were accepted by DPSS. GR applicants were referred to the job training program.

10. The ostensible basis for the termination notices was that employable recipients are "eligible for a job/training stipend from the Los Angeles County DCS which equals a share of your current basis General Relief grant." DPSS Termination Notice Exhibit "A", attachment D.

11. On information and belief, at the time of these referrals, the Los Angeles County job training program developed by DCS and the County Private Industry Council (PIC) had not been fully funded or finally approved, in conformance with the governing requirements of state law, Unemployment Insurance Code §15000 et seq., and of federal law, 29 USC §1501, et seq.

12. The County's proposed job training plan must be presented in a public hearing for which notice is provided 30 days in advance, and a 30-day post hearing comment period must be provided prior to final adoption of the plan by the PIC and submission to the County Board of Supervisors. Unemployment

Insurance (Un. Ins.) Code §15052. The present County job training plan was not subject to this review.

13. County funding for the proposed JTPA job training program was not approved by the County Board of Supervisors in time for the October 1 program starting date. At its meeting of Tuesday, September 27, 1983, the Board postponed any decision to its meeting scheduled for October 4, 1983. Board consideration was deferred to allow investigation into allegations that 1) DCS is spending in excess of 15% of JTPA funds on administrative expenses, in violation of federal requirements, and 2) the County's focus on the GR population (which is 72% male) for its job training program discriminates against women and other groups eligible for federal job training. The Board finally approved the funds on October 6, 1983.

14. Under the County General Relief Program, recipients are entitled to procedural due process protections before aid may be terminated for failure to satisfy program requirements. Appeal procedures and standards for good cause have been established, and aid is paid pending an appeal. Special allowances for clothing, special dietary needs, occupational or trade tools, and emergency foreclosure, utility and rent assistance are available to recipients. The monthly grant of $228.00 is paid in one check at the beginning of the month to permit recipients to pay their monthly rent. On information and belief, most recipients must use as much as 80% of their grant amount for rent.

15. Under the proposed County JTPA program, trainees will receive stipends twice a month in the amount of approximately

$114.00. Trainees who fail to attend their training sessions, which may require as much as 30 hours a week, will not receive a stipend. No procedures for grievances, notice of termination, or appeals have been published or developed by DCS for the benefit of the trainees. On information and belief, a trainee who asserts good cause for failure to perform, or who is otherwise unable to satisfy the program requirements, is not provided with any stipend or financial assistance while he or she appeals the termination of benefits. Under the proposed JTPA plan, no additional allowance is provided for clothing, special diets, emergency eviction assistance or other special needs.

16. Many terminated GR recipients requested a hearing concerning their referral to job training. DPSS scheduled mass hearings at which recipients were assured that they would receive a monthly stipend at least equal to their GR grant, and were persuaded to sign waivers of their procedural rights on this basis. On information and belief, at the time these waivers were signed and recipients induced not to contest their terminations, plaintiffs and other recipients were not informed that they would not receive their entire stipend at the beginning of the month so as to be able to pay their rent, that no special needs allowances would be available, that no appeal and grievance procedures were available and that no assistance would be paid pending on appeal.

17. Some portion of the GR recipients terminated from the program were referred to training programs and informed that the program will provide them with a stipend on October 5, 1983.

Some recipients contacted the training program to which they were assigned, to find that the program has been cancelled. A significant portion of those terminated have not received any training assignment. Some were told to report to the County Hall of Records on October 3rd, 4th or 5th and that they will be given a stipend and assignment at that time. Others were told that they will receive a stipend and an assignment but no specific date has been established.

18. 14,000 GR recipients have been refused aid, because they are "eligible" for the JTPA program. However, only an estimated 9000 adult training positions are available, according to the proposed county job training plan. (See "County of Los Angeles Program Narrative" for a description of the County's JTPA program attached hereto as Exhibit H). County DCS officials have stated that the remaining 5000 recipients terminated from GR are not expected to appear for their stipend or placement, apparently due to the confusion created by the transfer.

FIRST CAUSE OF ACTION

(Violation of Welfare and Institutions Code §17000)

19. Plaintiffs hereby reallege all previous paragraphs of this complaint and incorporate them herein by reference.

20. Until September 30, 1983, plaintiffs, and other persons classified as 'employable', were eligible for benefits under the County's General Relief program, pursuant to the mandate of Welfare and Institutions Code §17000. Los Angeles County provides cash assistance to its indigent residents who are not eligible for other aid programs under the General Relief

Program. This includes adults between the ages of 18 and 65, who have no children under age 18 and who have not met the disability requirements for the Supplemental Security Program.

21. Upon being notified of their termination from the General Relief program in early September, 1983, plaintiffs were informed that they would be ineligible for further benefits because of a blanket policy adopted by defendant DPSS excluding persons eligible to receive a job training stipend under the County's job training program. DPSS terminated approximately 10,000 to 14,000 persons on the General Relief Program in early September based on their eligibility for job training scheduled to begin on October 1, 1983.

22. The County's job training plan, although formulated by defendants DCS and PIC had not yet received approval or funding by the County Board of Supervisors or California State Job Training Council at the time defendant DPSS terminated thousands of General Relief recipients throughout the County. The majority of terminated recipients have not received job training placement, since the program does not yet exist, and find themselves without the benefits or protections of the General Relief program.

23. The actions of defendants in terminating plaintiffs based on their presumed eligibility for a nonexistent job training program violates their rights to relief and support from the County, in contravention of the duty of defendants set forth in California Welfare & Institutions Code §17000, et seq.

24. Unless this Court issues preliminary and permanent injunctive relief, County taxpayers, such as and including

plaintiffs, and plaintiffs and all other terminated General Relief recipients in Los Angeles County will suffer irreparable harm.

25. Plaintiffs have no remedy at law adequate to prevent the continuing and irreparable injury caused by defendants' acts and omissions.

SECOND CAUSE OF ACTION

(Violation of Due Process)

26. Plaintiffs reallege all previous paragraphs of this complaint and incorporate them herein by reference as if fully set forth at this point.

27. By their actions in denying General Relief benefits to plaintiffs and other terminated recipients not yet placed in job training, and in coercing plaintiffs and others to waive their rights to a hearing based on misrepresentations regarding the comparability of the job training program to that of General Relief, defendants have denied plaintiffs and others their fundamental rights without due process of law in violation of the Fourteenth Amendment to the United States Constitution and Article I, Section 7(a) of the California Constitution.

28. By their actions in failing to allow for the public hearing for which notice is provided 30 days in advance; and 30-day post hearing comment period prior to final adoption of the County plan as required by Un. Ins. C. §15052, defendants have denied plaintiffs and others their fundamental rights without due process of law in violation of the Fourteenth Amendment to the United States Constitution and Article I, Section 7(a) of the California Constitution.

THIRD CAUSE OF ACTION

(Illegal Use of Public Funds)

29. Plaintiffs hereby reallege and incorporate by reference all previous paragraphs as if fully set forth at this point.

30. Defendants have expended public funds, and are continuing to expend public funds, in an illegal manner by failing to administer the General Relief program so as to grant eligibility to all who meet the eligibility requirements and who are not placed into a fully funded, bona fide job training program.

31. Plaintiffs have paid a tax to the State of California and to the County of Los Angeles within the past year and have been affected substantially by the illegal expenditures of the defendants.

32. The conduct of the defendants, unless and until enjoined and restrained by order of this Court will cause great and irreparable injury to plaintiffs in that defendants will continue to make illegal expenditures by failing to administer the General Relief program in accordance with law.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs pray that this Court:

1. Issue a preliminary and permanent injunction

(a). prohibiting defendantr from terminating or denying General Relief benefit to otherwise eligible applicants and recipients until such time as said individuals are referred to and accepted by a bona fide, approved and funded job training service provider with benefits and protections comparable to the General Relief program.

(b). prohibiting defendants from failing to grant General Relief benefits to eligible persons on the basis of their presumed eligibility for a job training stipend.

2. Grant plaintiffs' costs of this suit and reasonable attorneys' fees;

3. Grant such other relief as this Court may deem just and proper.

DATED: October 13, 1983.

GARY L. BLASI
LINDA RUTH BEECHER
BYRON GROSS
BRUCE IWASAKI
LEGAL AID FOUNDATION OF LOS ANGELES

MELINDA R. BIRD
CARMEN A. ESTRADA
WESTERN CENTER ON LAW AND POVERTY, INC.

By: ______________________
GARY L. BLASI
Attorneys for Plaintiffs

COUNTY OF LOS ANGELES
DEPARTMENT OF COMMUNITY SERVICES

3175 West Sixth Street / Los Angeles, California 90020
(213) 738-2611

DONALD G. GALLOWAY
Director

TEPHANIE KLOPFLEISCH
Chief Deputy Director

BOARD OF SUPERVISORS
PETER F. SCHABARUM
KENNETH HAHN
EDMUND D. EDELMAN
DEANE DANA
MICHAEL D. ANTONOVICH

Susan

December 12, 1983

RECEIVED
14 1983
SUBCOMMITTEE ON
EMPLOYMENT OPPORTUNITIES

TO: Each Supervisor

FROM: Donald G. Galloway, Director Donald G. Galloway

SUBJECT: COUNTY EMPLOYMENT AND TRAINING PROGRAM FOR FORMER GENERAL RELIEF RECIPIENTS

On November 29, 1983, your Board approved Supervisor Dana's motion directing the Departments of Community Services and Public Social Services and the Chief Administrative Office (CAO), in conjunction with the Private Industry Council (PIC) to report on several issues related to the County's Employment and Training Program for former General Relief recipients. That report is attached together with an Executive Summary for your convenience. The Chief Administrative Office, County Counsel, and DPSS have participated in the development of this report and concur in its contents.

Fiscal Policy Report

In a separate action on December 6, 1983, your Board approved Supervisor Edelman's motion as amended by Supervisor Dana, directing the CAO and this department to carry out a feasibility study regarding additional County funding to serve persons other than former welfare recipients in the Employment and Training Program. The CAO will be providing you with that report by January 3, 1983.

State Employment Development Department (EDD) Review

State EDD has completed its review of the County's program plan and found it to be in full compliance with thw Job Training Partnership Act (JTPA). A copy of the Declaration of Findings is included as Attachment II.

Each Supervisor
December 12, 1983
Page 2.

The concept of employment and training alternatives for welfare recipients is a major public policy issue and you may continue to receive media inquiries regarding the County's program. The debate as to whether limited training and employment resources should be offered to readily trainable unemployed or to hard-core structurally unemployed persons is of great interest to the media.

If you have any questions or need further information, please let me know or your staff may contact Mr. Larry Johnson at 738-2608.

DGG:ah
Attachments

cc: Harry L. Hufford
DeWitt Clinton
Ed Tanaka, DPSS
Private Industry Council

EXECUTIVE SUMMARY

REPORT ON EMPLOYMENT AND TRAINING PROGRAM FOR FORMER GENERAL RELIEF RECIPIENTS

I. ISSUES RAISED IN THE NOVEMBER 27, 1983 LOS ANGELES TIMES ARTICLE

Purposes and Benefits of the Program

- Achievement of economic self-sufficiency for individuals who would otherwise be dependent upon welfare subsidies.

- Improvement of the general economic outlook of the County as former welfare recipients become taxpayers, consumers and contributers to local productivity.

- A minimum $4 million savings in County General Funds that would otherwise have been spent for public assistance payments during the 1983-84 Fiscal Year.

Procedures for Evaluating and Assigning Participants

- Although some mismatches of individuals to program sites did occur during start up, such situations have been resolved by the department on an agency-by-agency and case-by-case basis.

- A screening and referral system is in place which takes into consideration the interests, aptitudes, past work experience and residence of each participant.

- Participants are offered a wide range of activities including one or more of the following: job search assistance, remedial education, English as a Second Language, classroom training in occupational skills, on-the-job training with private employers and work experience to develop basic employability skills.

Access to the Job Training Partnership Act (JTPA) Program

- Approximately fifty-eight (58) percent of the County's JTPA funds are available for services to individuals other than former General Relief recipients.

State Review of the County's Program

- State Employment Development Department has completed their review of the County's JTPA Plan and concluded: 1) The Plan was developed, submitted and approved in accordance with JTPA and 2) The plan contains provisions to satisfy the employment and training services to the groups identified in JTPA.

- The EDD review was carried out at the request of the Western Center on Law and Poverty. EDD is required to routinely review all such complaints.

II. PROGRAM IMPROVEMENTS

- A participant screening, evaluation and referral process as described earlier.

- Quarterly program reports to the PIC Operations Committee and to the Board.

- An expansion of the Department's Job Development Section.

- A uniform appeal process.

- A service provider's forum established at the suggestion of the PIC.

III. PIC COMMENTS

- The PIC is aware that some administrative problems have occurred as the program was being implemented. However, they have also indicated their belief that the department seems to have moved quickly and aggressively to handle the implementation problems as they have surfaced.

REPORT

EMPLOYMENT AND TRAINING FOR FORMER GENERAL RELIEF RECIPIENTS

This report is to provide information on comments which appeared in a recent newspaper article regarding the County's Employment and Training Program, and to provide a general update on the status of that project.

Background

On November 27, 1983, an article appeared in the Los Angeles Times which expressed concerns regarding the County's Employment and Training Program. On November 29, 1983, on a motion of Supervisor Dana, the Departments of Community Services and Public Social Services, and the Chief Administrative Office, in conjunction with the Private Industry Council (PIC), were instructed to report on the comments mentioned in the article, on a State study of the County's job training program, and on recommendations for program improvements. Attachment I contains a copy of the Board motion and newspaper article for your information.

Newspaper Comments

The comments contained in the newspaper article touch on several aspects of the Employment and Training Program: the purpose and benefits of training former General Relief recipients, the procedures followed in assigning participants to training activities and the types of training and related services provided to enrollees.

Purpose and Benefits of the Employment and Training Program

For the 1982-83 Fiscal Year, the Department of Community Services, with Chief Administrative Office, PIC and Board approval, and in cooperation with DPSS, developed and implemented a pilot program to offer employment and training opportunities available under the Comprehensive Employment and Training Act (CETA) program to approximately eighteen hundred (1800) General Relief and State AFDC-U welfare recipients. This demonstration effort achieved positive results, both in terms of improving the employability of the participants and in achieving a financial benefit to the County. As a result of this program, $10.7 million in General Fund welfare costs were avoided.

Based upon the success of this effort, the department proposed that the program be expanded for 1983-84 to provide employment and training opportunities to all persons receiving General Relief as of October 1, 1983 and all eligible persons applying for General Relief during the program period determined employable by DPSS. This proposal was approved by the CAO and by your Board during 1983-84 budget deliberations. While this is admittedly an ambitious undertaking, the experience of 1982-83 demonstrates that it can work. Moreover, there are a number of benefits to be obtained from such an effort:

-- Achievement of economic self-sufficiency for individuals who would otherwise be dependent upon welfare subsidies.

-- Improvement of the general economic outlook of the County as former welfare recipients become taxpayers, consumers and contributers to local productivity.

-- A minimum $4 million savings in County General Funds that would have otherwise been spent for public assistance payments during the 1983-84 Fiscal Year.

Unfortunately, the newspaper article implies that financial benefit is the County's principal, if not sole, motivation in undertaking this program. While the budgetary advantages are certainly important, there are other benefits to individuals and the local economy as discussed above, that are of equal or greater significance.

Procedures for Evaluating and Assigning Participants

A concern is expressed in the newspaper article that former General Relief recipients are not being appropriately screened and referred to training assignments. Although some mismatches of individuals to training sites did occur at the beginning of the program and specifically for twenty-five (25) clients at the Chinatown Service Center, these were the result of start-up problems. Such situations have been resolved by the department on a case-by-case and agency-by-agency basis.

At this time, a screening and referral system is in place which takes into consideration the interests, aptitudes, past work experience, and residence of each participant. Depending upon his or her needs and interests, the participant will be referred to one of a number of employment and/or training projects. These include a wide range of activities: job search assistance for the most job-ready, remedial education for those who lack basic reading and math competencies, classroom training in occupational skills, on-the-job training with private employers, or work experience to develop basic employability skills (habits of good attendance, promptness, acceptance of supervision, etc.). Some programs may include a combination of two or more of these activities.

Quality of Training

A concern was raised in the newspaper article about whether the County is engaged in a "sincere, genuine effort" to make former

GRs competitive in the job market. As noted above, a full range of employment and training activities is being made available to the former General Relief recipients, with the participants' assignment based upon ability and interest. In cases where occupational training is the selected option, a wide variety of choices are available. These range from short-term training for occupations such as Custodian and File Clerk, to high-skill programs for occupations such as Auto Mechanics, Word Processing and Bank Teller.

Training for Non-GRs

A further concern expressed in the newspaper article is that the County's Employment and Training Program provides very limited opportunities for unemployed persons who are not on or applying for General Relief.

In fact, approximately fifty-eight (58) percent of the County's JTPA funds are available to groups other than former GRs. The fifty-eight (58) percent is made up of the forty-four (44) percent of JTPA funds set aside for youth, and the fourteen (14) percent available for service to adults who are not former GRs.

It should also be noted that the former General Relief recipients in the program represent every significant segment group targeted for service under JTPA. These include women, veterans, the handicapped, and each of the age and ethnic categories.

State Study

The November 27, 1983 newspaper article, and a subsequent article that appeared on November 30 (Attachment III), cited an "investigation" of the County's job training program by the State and implied the involvement of the Governor. The State Employment Development Department was conducting a routine administrative review of limited elements of the County's Job Training Plan, as required by State law. Unfortunately, the newspaper article created a false impression that the State was conducting a political investigation, when in reality they were carrying out a routine administrative review conducted to meet the requirements of State law.

The study was not initiated by the State or the Governor, but resulted from the requirements that the Director of EDD, whenever he receives a complaint about a JTPA program, look into the complaint and make a formal declaration of finding. EDD was reviewing the County's Plan as a result of a complaint submitted by the Western Center on Law and Poverty and not at the request of any other agency or official.

The study was assigned to the EDD Legal Section which concluded that the County's Service Delivery Area Plan was developed, submitted and approved in accordance with JTPA and further that the Plan contained provisions to satisfy the employment and training services to the groups identified in JTPA. A copy of EDD's findings is attached. Western Center on Law and Poverty and Legal Aid have requested another Court Hearing on December 14, 1983 before Judge Leon Savitch to challenge various aspects of the program. The department will report on the outcome of the hearing.

Program Improvements

As indicated above, some start-up problems occurred at the beginning of this year's Employment and Training Program for former GRs. This was primarily due to the high intake which far exceeded past projections. Since that time, a number of procedures have been set in place to ensure that program participants are appropriately screened and referred to activities that will assist them in achieving self-sufficiency and will be provided a training stipend or wage comparable to the enrollee's previous welfare grant. These procedures include the following:

-- A participant screening, evaluation and referral process as described earlier in this memo. This process has been decentralized to six (6) sites around the County to ensure strong coordination between this department, DPSS and JTPA service providers.

-- Quarterly program reports to the PIC Operations Committee and to the Board regarding program progress.

-- An expansion of the department's Job Development Section to ensure that job ready former GR participants receive the assistance they need to obtain employment.

-- A uniform appeal procedure to ensure due process to enrollees on matters pertaining to level of stipend or wage, participation in the program, etc.

-- A service provider's forum to permit contractors to bring service problems to the department for immediate resolution.

PIC Comments

In response to the Board's request that the PIC contribute input to this report, the members of the PIC Executive Committee have provided the following comments:

-- The PIC is confident that the County's JTPA Plan is legal and that the review and approval process was adequate.

-- For several reasons (delay in State instructions and late appointment of the new PIC), the PIC did not have time for much input into the current Job Training Plan. However, given the time constraints and implications for the County budget, the PIC determined to support the Board in the implementation of the 1982-83 General Relief employment program.

-- The PIC is aware that some administrative problems have occurred as the program was being implemented. However, they have also indicated their belief that the department seems to have moved quickly and aggressively to handle the implementation problems as they have surfaced.

-- At the recommendation of the PIC, the department has instituted a forum where contractors can come at least once a month to air administrative problems and seek solutions.

Summary

In summary, the Employment and Training Program for former GRs was established on a pilot basis last year. It was developed for four (4) major reasons:

1. Because the ability to get and retain a job is a major factor in the definition of self-worth in our society;

2. Because General Relief recipients are among those most in need of assistance in becoming employable;

3. Because welfare is a drain on the productivity and solvency of our economy, in addition to the sense of failure it can create in able bodied individuals; and

4. Because such a program can mitigate County welfare costs.

Based upon its success last year, the program was expanded to all former employable GR recipients. Although this is an ambitious undertaking, systems have been established to ensure appropriate referral, training and supportive services to the enrollees, to ensure stipend or wage payments at least equal to their welfare grants and to ensure due process for those who wish to appeal some aspect of their participation in the program. The program has only been in operation for eight (8) weeks, but has nevertheless encompassed the caseload in a clear, definable program.

Concurrence

The Chief Administrative Office, County Counsel, and DPSS have participated in the development of this report and concur in its contents.

ATTACHMENT I

MEETING
DECEMBER 6, 1983
SYN. NO. ______
ATTACHMENT XV

November 29, 1983

MOTION BY SUPERVISOR DEANE DANA

This past Sunday's LOS ANGELES TIMES featured an article on how the County's job training program targeted to General Relief recipients is being studied by the State through its Employment Development Department. Mentioned in the article are viewpoints by the private sector and State officials, as well as comments by several representatives of the Department of Community Services. In addition, the article cited several situations, all indicating that the County's jobs training program is not working and will not be successful.

The County's current budget was adopted in part based on the success of operating a Federally-funded job training program targeted to General Relief recipients. If the scope of the program is drastically altered, then we face the real possibility of layoffs of additional County employees. Because the points raised in the article are of a serious nature potentially affecting the welfare of thousands of County recipients,

I, THEREFORE, MOVE THAT the Department of Community Services, Department of Public Social Services, and the Chief Administrative Office, in conjunction with the Private Industry Council report within two (2) weeks on the comments and situations mentioned in the article, the status and intent of the State study; and a recommended program as to how the County's current employment training effort can be improved.

#####

MOTION

Schabarum	____________
Hahn	____________
Edelman	____________
Dana	____________
Antonovich	____________

1R

Los Angeles Times
Sunday, November 27, 1983

County Jobs Training Program Studied by State

By LEO C. WOLINSKY, Times Staff Writer

At the Chinatown Service Center, directors of a jobs program that specializes in teaching Asian refugees to speak English were puzzled by the applicants sent them last month by Los Angeles County. All 20 were unemployed blacks from the inner city, hardly in need of Chinese-English translators.

The Asian refugees, meanwhile, had been sent to another training center run by the county superintendent of schools where none of the instructors could speak their languages. "These people were sitting around not learning a damn thing," said an exasperated Jonson Ng, the Chinatown project manager.

Across town, directors of a San Fernando Valley jobs training center set up to help unemployed women were equally puzzled by their applicants. Six of the nine were men and all lived in central Los Angeles, nearly 20 miles away.

At these centers and in many others spread out across Los Angeles County the applicants are general-relief recipients—the first wave of an estimated 8,000—who are being forced into a new national jobs-training program under a unique and controversial plan intended to cut the county's welfare costs.

County supervisors in a footnote to last July's budget hearings offered able-bodied general-relief recipients a simple choice: either accept job training or automatically lose their $228 monthly welfare benefits.

CETA Replacement

As a vehicle for that training, the county selected a Reagan Administration program designed to replace the defunct Comprehensive Training and Employment Act (CETA). Unlike the CETA program, which was enacted to deal with the country's economic recession but was criticized for creating "make-work" jobs in public agencies, the Reagan plan emphasizes job training in private firms under the direction of industry-dominated boards appointed by the governors of each state.

But only six weeks after the training officially got under way, the Deukmejian Administration, through the Employment Development Department, has quietly launched an investigation into Los Angeles County's program, based on criticism from lawyers who represent the general-relief recipients, directors of the job training centers and complaints from some of the Republican governor's own appointees.

All sides agree the goal of training relief recipients is laudable. But the critics argue that by flooding the training program with general-relief recipients, the county is leaving little or no room for training of jobless people who are not on welfare. The critics cite bureaucratic slip-ups like those that have occurred in the Chinatown and valley centers and they question whether the county is serious about job training or merely trying to so frustrate welfare recipients that they simply leave the county or stop applying for benefits.

"These people are being placed in a program which on the surface appears to be one thing but underneath is not a sincere, genuine effort to make these people competitive in the job market," said Howard Boyle, chairman of a coalition of private centers that are providing job training for the county. "It's a bureaucratic disaster. We know most of (the general-relief recipients) will not be placed in private industry."

Political Questions

County officials who administer the program insist they are serious about training and finding jobs for those on general relief, saying these recipients represent the most needy elements of society. What happened in the Chinatown, valley and other programs, they claim, was simply the result of "start-up problems."

Opponents have attempted to block the program, first by appealing to county supervisors and then by going to court. So far, it has survived those challenges.

Ralph Milton, the EDD's acting chief counsel, confirmed that the state investigation is under way but declined to comment on specifics until the probe is completed, probably in mid-December. The investigation is expected to raise some politically thorny questions about whether this effort will be any more successful at combating unemployment and reducing relief costs than earlier job plans like CETA.

The Los Angeles County program, in fact, is only one of hundreds set up across the nation under the Reagan Administration program. In California, more than $300 million was set aside for the first nine months to be distributed by local governments and the boards, mostly composed of influential business leaders appointed by Deukmejian. The only requirements are that 40% of the money go to help youth and that all other jobless groups be treated equally.

Michael O'Reilly, executive director of the state Job Training Coordinating Council, said that throughout California the funds generally have been distributed proportionately among all segments of the unemployed population. Los Angeles County, he said, was the only one to limit the funding to general-relief recipients.

They were singled out by the financially strapped Board of Supervisors because general relief, which costs $74 million annually, is the only welfare program that is almost entirely county supported and all previous attempts to stem its growth have failed. There are currently about 33,000 people—mostly young men—on general relief in Los Angeles County, about half of whom are considered unemployable because they are incapacitated by such conditions as uncontrolled alcoholism or drug addiction but do not have the kinds of permanent disabilities that enable them to receive other government aid.

Fewer Opportunities

While the county believes the rest of the recipients are capable of holding jobs, the critics contend that limiting training to those on general relief means fewer opportunities for other unemployed groups including refugees, recipients of state and

[Please see JOBS, Page [illegible]]

BEST COPY AVAILABLE

JOBS: Shaky Start

Continued from Page 7

after 90 days, state law requires county government to care for indigents under all circumstances.

Carmen Estrada, an attorney for the Western Center on Law and Poverty, said there already have been a number of relief recipients who were assigned to training programs only to find they were canceled and their benefits cut off. The effect of the program, she said, is to strip away a whole raft of laws aimed at protecting the poor.

"It's not to say these people will not end up on some other county's welfare rolls," Estrada said. "There will be an increase in homelessness and while there may be a short-term savings, over the long term there will be an equivalent price to pay."

Vincent Terry, an assistant director of the county's Community Services Department which runs the program, blames the controversy on directors of the private jobs centers, who, he said, have not been able to adjust to the new regulations. He also insists that no one on relief has lost monthly benefits yet, adding that the county has been "extremely flexible" thus far in dealing with the recipients.

Once the details can be worked out, he added, an appeals procedure will be put in place to make sure their rights are protected. But Terry stressed that "we're not running a welfare program."

"This has been a major undertaking because what we are doing now is a substantial departure from all our activities under the welfare program," he said. "We are trying to develop a sense of responsibility, or reliability, trying to get them to the point where they not only can attain a job but retain a job once it's secured."

Los Angeles Times

JOBS: State Looks at Prograı

Continued from Page 1

federal welfare programs such as Aid to Families with Dependent Children and women, who make up only 28% of the general-relief population.

"These traditional poverty groups are saying to us, 'pay now or pay later,'" Boyle said. "If you neglect them now you will pay a greater price later on with institutionalization, family disintegration and with greater welfare dependency over the long run."

In part because of that criticism, the county now says it will allow 25% of the job training slots to be filled by jobless people not on general relief. But the private job training groups say they have yet to see that happen.

Screening Criticized

Meanwhile, critics have gathered what they believe is powerful evidence that the county's primary goal is to force relief recipients off county rolls while relegating job training to a low priority. Only about 2,400 of an expected 9,000 jobless have been placed in private job training programs thus far. Of these, the county expects to eventually find jobs for only 20% to 25%, compared with a statewide placement average of 50% to 60%—mainly, officials say, because most general-relief recipients do not have the education or skills found among other jobless groups.

At the same time, those who run the job training centers say the county has made no effort to screen applicants, sending them to any program regardless of its emphasis or requirements and making plans to serve twice the number of trainees originally estimated with only half the promised funding. Those who can not be placed—an estimated 4,500 thus far—are being assigned to county work projects reminiscent of the old CETA program and where [illegible]
expected to be minimal.

Larry Johnson, one of several c
officials who oversees the jobs prog
concedes that funding has been l
than in previous years under the C
program. But he claims it is "more i
with what it should be" and is suffi
for the type of "entry-level" tra
that would most benefit relief recip
"We're not talking about high-tec
intensive training," he said.

Johnson also contends that achi
the county's 25% placement goal "w
be quite a success" despite higher p
tions elsewhere "when you take
account that we are trying to add
very, very difficult-to-place popula

Regardless of whether the tr
ever find a niche in private industr
county stands to save a signif
amount of money if, as officials
predicted, an estimated 4,000 to
employable general-relief recip
simply quit claiming benefits rathe
show up for job training. One est
places the savings as high as $4 milli
the first nine months.

Unresolved Questions

"This is a revolving-door tr
program, offering a few people
good training, a number of people
ing they don't need, and others
virtually get no training, just enou
get them out the door," said the di
of one jobs center who asked to r
anonymous for fear of reprisals fro
county.

One of the big unresolved questi
what will happen to general-relief
ients who either fail to complete tr
programs or who take private jo
later return to the ranks of the u
ployed. Although the program
simply terminate their welfare be

Please see JOBS, I

MEETING
DECEMBER 6, 1983
ATTACHMENT XVI

County Job-Training Officials Told to Shape Up Program

By LEO C. WOLINSKY, *Times Staff Writer*

11-30-83

Directors of a heavily criticized Los Angeles County job-training program designed to force general-relief recipients off welfare rolls were ordered Tuesday to improve their performance to forestall possible action by the state.

The Board of Supervisors, on a motion by Supervisor Deane Dana, gave top county managers two weeks to come up with a plan to deflect criticism that is expected to be raised by state investigators probing the jobs plan. The investigation was ordered by the Deukmejian Administration through its Employment Development Department.

The program, which is only 2 months old, is designed to pare county welfare costs by requiring as many as 9,000 general-relief recipients, judged to be employable by the county, to enroll in federally funded job-training centers or immediately lose their monthly benefits.

It has brought protests from lawyers who represent the relief recipients, from officials who run the training centers and from some of Gov. George Deukmejian's own appointees, who are supposed to monitor the job-training effort.

Critics of the program say it is really intended to drive welfare recipients out of the county or get them to stop applying for benefits. They cite a number of bureaucratic slip-ups as evidence that the county is not serious about job training. It has also been charged that by flooding the program with general-relief recipients, the county is leaving little or no room for training jobless people who are not on welfare.

Officials of the county's Community Services Department who oversee the jobs program say they aimed the program at general-relief recipients because they are the most in need of help. They claim that any problems are the result of the newness of the program.

But Dana said he is concerned that the charges, contained in a recent article published by The Times, are "of a serious nature potentially affecting the welfare of thousands of county residents."

He also noted that the county's $5.1-billion budget is predicated on the success of the jobs program in cutting welfare costs. If the scope of the program is drastically altered as a result of the state investigation, he said, "then we face the real possibility of layoffs of additional county employees."

State investigators say they expect to complete their inquiry by mid-December. The results eventually will be sent to Deukmejian, who could stop the funding or order changes in the way the program is run.

ATTACHMENT II

DECLARATION OF FINDINGS

Complainant: Western Center on Law and Poverty

Service Delivery Area: Los Angeles County

Background:

This declaration of findings relates to the Los Angeles County service delivery area plan for the period October 1, 1983 through June 30, 1984. This declaration of findings is the result of a complaint made by the Western Center on Law and Poverty on October 6, 1983. This declaration of findings is made pursuant to the provisions of section 15029 of the Unemployment Insurance Code.

Issues:

The issues raised by the complainant are as follows:

1. That the service delivery area plan was not developed and approved in accordance with the requirements of the Job Training Partnership Act (hereinafter JTPA) and/or the Family Economic Security Act (hereinafter FESA).
2. That the service delivery area plan improperly "targets" the general relief population for training services.

Findings:

PLAN DEVELOPMENT AND APPROVAL

The service delivery area plan was developed by the County of Los Angeles. The private industry council for the service delivery area (hereinafter SDA) was certified by the Governor on August 1, 1983. Notice of the private industry council (hereinafter PIC) meeting on August 11, 1983 and copy of preliminary agenda was mailed to interested parties on August 8, 1983. The PIC met on August 11, 1983 and gave its concurrence to the plan. Notice that the service delivery area plan (hereinafter Plan) was available for review was published in seven local newspapers on August 12, 13, and 14, 1983.

The Los Angeles County Board of Supervisors reviewed and concurred in the Plan on August 16, 1983. The Plan was forwarded to the Employment Development Department on August 24, 1983. The PIC and the County Board of Supervisors approved their agreement on September 6, 1983 and September 20, 1983, respectively.

The Plan was approved on September 27, 1983.

Chapter 537, Statutes of 1983 was signed by the Governor on July 28, 1983. That statute contained an urgency clause and was intended to implement JTPA. Section 15045 was added to the Unemployment Insurance Code to require a public hearing by the PIC on the proposed Plan with at least 30 days advance notice and a 30-day comment period prior to final adoption of the Plan.

JTPA required that interm plans be submitted by August 31, 1983. The Plan for the Los Angeles County SDA was submitted timely.

Therefore, it is concluded that the Plan was developed, submitted and approved in accordance with JTPA. Strict compliance with section 15045 of the UI Code was not possible due to the time limitations required by JTPA.

PLAN TARGET GROUP

The program narrative for the Los Angeles County SDA Plan provides, at page 1, as follows:

> "Potentially Eligible Population
>
> "Los Angeles County plans to serve targeted welfare recipients, specifically General Relief (GR), Aid to Families With Dependent Children-Unemployed (AFDC-U), Aid to Families With Dependent Children-Family Group (AFDC-FG), youth (ages 16-21), and other JTPA eligible individuals during this nine-month interim program. The targeted welfare client population, all of whom are unemployed, will make up a large portion of the client population to be served."

Section 141 of JTPA (29 USC 1551) provides, in part, as follows:

> "Except as otherwise provided, the following conditions are applicable to all programs under this Act: (a) Each job training plan shall provide employment and training opportunities to those who can benefit from, and who are most in need of, such opportunities and shall make efforts to provide equitable services among substantial segments of the eligible population."

* * *

Neither JTPA nor FESA prohibit an SDA Plan from targeting its employment and training opportunities for an identified segment of the eligible population, so long as youth, recipients of Aid to Families With Dependent Children and school drop-outs are properly served.

It is concluded that this Plan contains provisions to satisfy the employment and training services to the groups identified in JTPA.

Dated: November 29, 1983

K. R. KIDDOO
Director
Employment Development Department

cc: State Job Training
Coordinating Council
T. Bruinsma, Chairman

Western Center on Law
and Poverty, Inc.

STATE OF CALIFORNIA - HEALTH AND WELFARE AGENCY
GEORGE DEUKMEJIAN, Governor
EMPLOYMENT DEVELOPMENT DEPARTMENT
800 CAPITOL MALL, Sacramento, CA 95814 (916) 445-4546

October 27, 1983

Mr. A. Brooks Firestone
Founder and General Partner
Firestone Vineyard
P. O. Box 244
Los Olivos, CA 93441

insert APP15-16 PP 1

Dear Mr. Firestone:

At the Council meeting of October 13, 1983, concern was expressed that Job Training Partnership Office (JTPO) staff had inadvertently approved the Los Angeles County Job Training plan without ensuring that the conditions imposed by the Council Subcommittee had been met. The attached report summarizes the steps in the process by which the Los Angeles County plan was reviewed and approved.

Briefly, the Subcommittee recommended approval of the plan on condition that four defects would be cured. The areas requiring modification were:

- The SDA would rewrite the plan narrative to eliminate statement that only General Relief recipients would be served
- The SDA would submit a PIC/CEO Agreement
- The SDA would revise Table CIII - Performance Objectives
- The SDA would detail the process for selection of service providers.

Prior to providing administrative approval of the plan, staff was responsible for ensuring that the plan was modified to meet each one of these conditions. Subsequent to the Council Subcommittee meeting the SDA developed the required plan and on September 22, 1983 revised documents were transmitted to the Job Training Partnership Office. The defects having been corrected, the plan was processed, signed and approved.

As a result of concern that has been expressed by the Western Center on Law and Poverty and others regarding Los Angeles County's intended use of Job Training Partnership Act funds to reduce General Assistance welfare caseloads, it came to our attention and to the attention of the SDA staff that Table CIII and Exhibit D contained numerical inaccuracies which incorrectly indicated that AFDC recipients, Hispanics, older workers and females would be under served.

In discussions County staff indicated an intent to submit corrected copies of Table CIII and Exhibit D so that the service levels shown for these groups will reflect the actual intended service levels.

Not in Ltr. (attached) [illegible]

It should be noted that many of the concerns expressed by local service providers and other interested parties will not be satisfied by these changes, since those concerns relate more to the way in which the SDA is exercising the discretion provided to it under the Act and under state statutes. It is our intent to closely monitor the performance of the County to ensure that its operation of the program is in conformance to Federal and State laws and the policies of the Council.

In addition, the Legal Office of the Employment Development Department is conducting a formal investigation of the Los Angeles County Plan in response to the complaint submitted to the Director of EDD by the Western Center on Law and Poverty.

The results of that investigation will be reported to the Council by the Director.

Sincerely,

KARL W. GROSSENBACHER, Chief
Job Training Partnership Office

Attachment

cc: L.A. Subcommittee Members
Michael O'Reilly
Dave Paulsen

REVIEW AND APPROVAL OF THE LOS ANGELES COUNTY JOB TRAINING PLAN

August 29, 1983	Plan received in JTPO by the Contract Coordinator.
August 30, 1983	A pre-technical review was conducted to ensure that the contract package was complete.
September 6, 7, 8	Interdisciplinary Review Teams reviewed the plans. Also JTPO staff began to perform their summary review to prepare their comments and make staff reports to the SJTCC subcommittee members.
September 14, 1983	Subcommittee conditionally approved the plan with the following conditions: • SDA will rewrite narrative to exclude references that the SDA will serve only GR participants. • SDA will submit PIC/CEO Agreement. • SDA will revise CIII - Performance Objectives. • SDA will detail the process for selection of service providers.
September 16-26, 1983	SDA, with some technical assistance from the SDA Liaison, responded to the subcommittee's conditions on 9/22/83. • Rewrote and submitted a narrative that more accurately reflects who the program will serve • Submitted the - PIC/CEO Agreement, and - A narrative describing the Service Provider selection process. • Revised Chart III, Revised Planned Enrollment levels changes performance objectives.
September 27, 1983	JTPO staff routed the plan to the EDD Contract Coordinating Group
September 29, 1983	Plan signed by Chief of JTPO Service Delivery Area Liaison routed plan to EDD Contract Coordinating Group for final processing. Contract Coordinating Group returned plan to liaison staff to maintain in file and to send to SDA.

ptember 30, 1983	JTPO staff mailed signed plan to SDA.
October 5, 1983	Western Center on Law and Poverty sent a letter to JTPO expressing concern about the plan.
October 12, 1983	JTPO responded to the October 5th letter stating the Department is looking into the matter.
October 14, 1983	JTPO staff received a copy of a letter (dated 10/6/83) from the Western Center on Law and Poverty, Inc. requesting an investigation and hearing.
	JTPO staff met with EDD legal staff to discuss the L.A. Plan; the concerns of some of the SJTCC members (raised at the 10/13/83 SJTCC meeting in L.A.); and some of the issues raised as a result of the letter by Western Center on Law and Poverty.
October 17, 1983	SDA staff contact JTPO and plan to submit corrected CIII, Exhibit D, and worksheets in the contract to address the service level concerns.

COUNTY OF LOS ANGELES
DEPARTMENT OF COMMUNITY SERVICES

3175 West Sixth Street / Los Angeles, California 90020
(213) 738-2611

DONALD G. GALLOWAY
Director

STEPHANIE KLOPFLEISCH
Chief Deputy Director

BOARD OF SUPERVISORS
PETER F. SCHABARUM
KENNETH HAHN
EDMUND D. EDELMAN
DEANE DANA
MICHAEL D. ANTONOVICH

November 9, 1983

RECEIVED
Job Training Partnership Office
NOV 14 1983
Sacramento
#380

Mr. Karl W. Grossenbacher, Chief
Job Training Partnership Office
State Employment Development Department
800 Capital Mall
Sacramento, California 95184

Attention: Carmen Ochoa

Dr. Mr. Grossenbacher:

Attached for your information are the revised documents for Los Angeles County's Job Training Partnership Act, Title II Plan. These clarifications were made in accordance with the direction of the State Job Training Council at the time our plan was approved by the Council.

Please insert the attached pages on the State's Client Characteristic data involving 55 and over, Hispanic and AFDC Registrant categories. Please note we have corrected arithmetic error on the male/female plan goals.

If you have any questions, please contact Joe Huey on my staff at (213) 738-2937.

Sincerely,

Larry L. Johnson

LARRY L. JOHNSON, Assistant Director
Planning and Financial Management Branch

LLJ:ca
Attachments

This will consist of pre-employment training as discussed, in combination with the OJT activity and/or English-as-a-Second Language or Adult Basic Education instructions as most of this population will require remedial instruction. A similar pilot program conducted by the County in 1982-83 confirmed the need for this classroom training activity.

For the Adult program, the average cost per participant will be a low of $630 to a high of $770. Overall, 38.59% of the total adult enrolees will be placed in unsubsidized employment.

Youth Programs (ages 16-21)

In the Youth Program, the average cost per participant will be a low of $3,454 to a high of $3,826.

Classroom Training (ages 18-21)

The description for this activity is the same as the narrative for the adult program. However, out-of-school youths in the age range of 18-21 are emphasized.

On-the-Job Training (ages 18-21)

The description for this activity is the same as the narrative for the adult program. However, out of school youths in the age range of 18-21 are emphasized. Funding in this activity is not substantial so as to not create competition for available slots with the adult OJT program.

PERFORMANCE OBJECTIVES
Title IIA

ice Delivery Area COUNTY OF LOS ANGELES
eriod: October 1, 1983 to June 30, 1984

Adult Objectives	National Standards	To Be Completed by SDA Pursuant to DOL Standards and Guidelines	
		Variance Factor	SDA Planned Objectives
1. Entered Employment Rate--Number of adults who enter employment as a percentage of the number of adults who terminate.	50.4% (proposed)	-18.00	38.59%
2. Cost per entered Employment--Total expenditures for adults divided by the number of adults who enter employment.	$7,172.22 (proposed)	1,532.39	$ 7,998.75
3. Average Wage at Placement--Average wage for all adults who enter employment at the time of termination.	$4.39 per hour (proposed)	14	4.53
Welfare Entered Employment Rate--Number of adult welfare recipients who enter employment at termination as a percentage of the number of adult welfare recipients who terminate.	Determined by SDA (See Guidelines)	N/A	22.4%
Youth Objectives			
1. Entered Employment Rate--Number of youth who enter employment at termination as a percentage of the number of youth who terminate.	28.7% (proposed)	5.6	34.02%
2. Positive Termination Rate--Number of youth having a positive termination (entered employment plus employability enhancement terminations) as a percentage of the total number of youth who terminate.	76.7% (proposed)	-9.73	66.85%
3. Cost Per Positive Termination--Total expenditures for youth divided by the number of youth having a positive termination.	$4,351.50 (proposed)	857.39	$ 4,598.[illegible]

July 15, 1983

REVISED 10-[illegible]

Modification No.__________

Funding Title __________

Participant Program Plan

	Planned Enrollments		Planned Terminations				Total		
			Adult		Youth			Adult	Youth
	Number	% of Total	Number	% of Total	Number	% of Total	Number	% of Total	% of Total
I. Client Characteristics									
A. Total Participants	11760	100%	9000	100%	1584	100%	10584	85	15
B. Male	8027	68	6480	72	744	47	7224	90	10
C. Female	3733	32	2520	28	840	53	3360	75	25
D. 14-15 Year Olds	-0-	-0-	☒	☒	-0-	-0-	-0-	☒	-0-
E. 16-19 Year Olds	1179	10	☒	☒	1061	67	1061	☒	100
F. 20-21	581	5	☒	☒	523	33	523	☒	100
G. 22-44	8225	69.90	7403	82	☒	☒	7403	100	☒
H. 45-54	570	4.85	513	6	☒	☒	513	100	☒
I. 55 and Over	1205	10.25	1085	12	☒	☒	1085	100	☒
J. White (Non-Hispanic)	1652	14	1114	12	373	24	1487	75	25
K. Black (Non-Hispanic)	3004	26	2585	29	119	8	2704	96	4
L. Asian/Pacific Islander	870	7	720	8	63	4	783	92	8
M. American Indian/Alaskan Native	118	1	90	1	16	1	106	85	15
N. Hispanic	6115	52	4680	52	824	52	5504	85	15
	☒	☒	☒	☒	☒	☒	☒	☒	☒
II. Service Parity									
A. School Dropouts	2576	22	1890	21	428	27	2318	82	18
B. AFDC Registrants	1176	10	284	3	774	49	1058	27	73

NOTE: The "other" racial/ethnicity group in the planning information provided by EDAR represents individuals who declined to state race/ethnicity during the 1980 census. For planning purposes they are to be distributed among the four racial/ethnic groups in proportion to each group's incidence in the local population.

REVISED 10-21·

	Planned Enrollments		Planned Terminations				Total		
			Adult		Youth			Adult	Youth
III. Other Substantial Segments	Number	% of Total	Number	% of Total	Number	% of Total	Number	% of Total	% of Total
A. Handicapped	823	7	630	7	111	7	741	85	15
B. Unemployment Insurance Claimant	387	3	-0-	-0-	348	22	348	-0-	100
C. Veterans	2018	17	1800	20	16	1	1816	99	1
D.									
E.									
F.									
G.									
H.									
I.									
J.									
K.									
L.									
IV. Termination Data									
A. Entered Unsubsidized Employment			2880	32	540	34	3420	84	16
B. Youth Employability Enhancement Term					523	33	523		100
C. Other Terminations			6120	68	521	33	6641	92	8
D. Average Weeks of Training			20		20		20		
E. Average Wage at Placement			4.53		NA		4.53		

REVISED 10-21-81

REVISED 10-21-

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name
COUNTY OF ANGELES

B. SDA NUMBER

Performance Period PY

D. TYPE OF Standard
Plan
Recalculated

DATE Calculated

E. PERFORMANCE MEASURE
A. Average Wage at Placement (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I × J)
1. % Female	28.0	51.7	-23.7	-.002	.0474
2. % 45-54 years old	4.85	4.5	.35	.001	.0004
3. % 55 years old & over	10.25	2.2	8.05	-.015	-.1208
4. % Black	26	29.9	3.09	-.003	.0117
5. % Hispanic	52	9.4	42.06	.000	.0117
6. % Other minority	9.0	4.9	4.1	.007	.0287
7. % Dropout	21.0	30.2	-9.2	-.007	.0644
8. % Handicapped	7.0	10.1	- 3.1	.003	- .0093
9. % UI claimant	0.0	7.0	- 7.0	.007	- .0490
10. % Welfare recipient	90.0	30.7	59.3	.001	.0593
11. Average wage for area (000)	16.3	15.3	1.0	.109	.1090
				TOTAL →	.1418

National Departure Point (National Average Performance Level)	$4.39	
Model-Adjusted Performance Standard	4.53	
Parameters Limits	(+) 4 (-) 6 % pts,7$	
Governor's Adjustment Factor	( )	
SDA Performance Standard		

BEST COPY AVAILABLE

U.S. Department of Labor • Employment and Training Administration

JTPA Performance Standards Worksheet

Service Delivery Area's Name: COUNTY OF LOS ANGELES

SDA Number:

C. Performance Period PY ______

D. Type of Standard
[ ] Plan
[ ] Recalculated

Date Calculated ______

E. Performance Measure
A Cost per Entered Employment (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	28.0	51.7	- 23.7	22.04	- 522.35
2. % 45-54 years old	4.85	4.5	.35	96.66	33.83
3. % 55 years old & over	10.25	2.2	8.05	-78.39	-631.04
4. % Black	26	29.9	3.09	4.19	- 16.34
5. % Hispanic	52	9.4	42.06	-2.21	-94.15
6. % Other minority	9.0	4.9	4.1	-20.12	- 82.49
7. % Dropout	21.0	30.2	- 9.2	17.73	- 163.12
8. % Handicapped	7.0	10.1	- 3.1	9.00	- 27.90
9. % UI claimant	0.0	7.0	- 7.0	-.66	4.62
10. % Welfare recipient	90.0	30.7	59.3	49.43	2,931.20
11. Average wage for area (000)	16.3	15.3	1.0	366.99	366.99
12. Unemployment rate	9.3	9.0	0.3	323.27	96.98
13. Average weeks participated	20.0	29.5	- 9.5	112.60	- 1,069.70
				TOTAL ➤	826.53

L. National Departure Point (National Average Performance Level)	$7,172.22	Q.	
M. Model-Adjusted Performance Standard	7,998.75		
N. Parameters Limits	(+) 20 (-) 25		
O. Governor's Adjustment Factor	% pts./$ ( )		
P. SDA Performance Standard			

BEST COPY AVAILABLE

2

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name
COUNTY OF LOS ANGELES

B. SDA NUMBER

C. Performance Period
PY ________

D. TYPE OF Standard
☐ Plan
☐ Recalculated

DATE
Calculated ________________

E. PERFORMANCE MEASURE
A. Entered Employment Rate (Adult)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	28.0	51.7	-23.7	.03	- .71
2. % 45-54 years old	4.85	4.5	- .35	-.56	-. -196
3. % 55 years old & over	10.25	2.2	8.05	.21	1.69
4. % Black	26	29.9	3.09	-.07	+.273
5. % Hispanic	52	9.4	42.06	.00	3.408
6. % Other minority	9.0	4.9	4.1	.18	.74
7. % Dropout	21.0	30.2	-9.2	-.08	.74
8. % Handicapped	7.0	10.1	-3.1	-.20	.62
9. % UI claimant	0.0	7.0	-7.0	.26	- 1.82
10. % Welfare recipient	90.0	30.7	59.3	-.26	- 15.42
11. Average wage for area (000)	16.3	15.3	1.0	-.68	- .68
12. Unemployment rate	9.3	9.0	0.3	-1.53	- .46
				TOTAL	-11.815

L. National Departure Point (National Average Performance Level)	50.41	O.	
M. Model-Adjusted Performance Standard	38.59%		
N. Parameters Limits	(+) 13 (-) 17 %		
O. Governor's Adjustment Factor	( ) 2 pts./%		

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name: COUNTY OF LOS ANGELES

B. SDA Number:

C. Performance Period PY ______

D. Type of Standard: 1) Plan 2) Recalculated

Date Calculated ______

E. PERFORMANCE MEASURE: A. Cost per Positive Termination (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL. AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female	52.7	47.2	5.5	-12.13	- 66.72
2. % 14-15 years old	0	6.9	- 6.9	-57.02	93.44
3. % 16-19 years old	67.0	81.0	-14.0	-42.05	599.0
4. % Black	8	33.7	-25.7	-9.55	245.44
5. % Hispanic	52	10.9	41.10	-1.73	- 71.10
6. % Other minority	5.0	3.9	1.1	-40.97	- 45.07
7. % Dropout	26.5	23.7	2.8	49.49	138.7
8. % UI claimant	1.0*	1.0	-0-	-44.45	-0-
9. % Welfare recipient	31.1	32.1	-1.0	5.00	- 5.0
10. Average wage for area (000)	16.3	15.3	1.0	208.04	208.04
11. Unemployment rate	17.7	9.0	8.7	87.04	757.25
12. Average weeks participated	20	39.2	-19.2	83.75	-12.08
				TOTAL ➤	246.88

L. National Departure Point (National Average Performance/Level)	$4,351.50	a	/
M. Model-Adjusted Performance Std.	$4,598.38		
N. Parameters Limits	(+) 30 (-) 31		
O. Governor's Adjustment Factor	( ) % pts./$		
P. SDA Performance Standard			

*Local SDA data base was not accurate to estimate computation of this factor.

U.S. DEPARTMENT OF LABOR • Employment and Training Administration JTPA Performance Standards Worksheet	A. Service Delivery Area's Name COUNTY OF LOS ANGELES
B. SDA NUMBER	
C. Performance Period PY ______	D. TYPE OF Standard [ ] Plan [ ] Recalculated
DATE Calculated ______________	E. PERFORMANCE MEASURE A Positive Termination Rate (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS (I times J)
1. % Female	52.7	47.2	5.5	.18	.99
2. % 14-15 years old	0	6.9	- 6.9	.25	- 1.73
3. % 16-19 years old	67.0	81.0	-14.0	.21	- 2.94
4. % Black	8	33.7	-25.7	.03	= -.771
5. % Hispanic	52	10.9	41.10	.00	0
6. % Other minority	5.0	3.9	1.1	.32	0.35
7. % Dropout	26.5	23.7	2.8	-.27	- 0.76
8. % UI claimant	1.0*	1.0	0	.77	0
9. % Welfare recipient	31.1	32.1	- 1.0	-.13	0.13
10. Average wage for area (000)	16.3	15.3	1.0	-.60	- 0.68
11. Unemployment rate	17.7	9.0	8.7	-.51	- 4.44
				TOTAL	-9.85

L. National Departure Point (National Average Performance Level)	76.7%	Q
M. Model-Adjusted Performance Standard	66.85%	
N. Parameters Limits	(+) 11 (-) 10	
O. Governor's Adjustment Factor	% pts./% ( )	
SDA Performance Standard	*Local SDA data base was not accurate to estimate computation of this factor. National average was	

658

U.S. DEPARTMENT OF LABOR • Employment and Training Administration

JTPA Performance Standards Worksheet

C. Performance Period PY'____	D. TYPE OF Standard ( ) Plan ( ) Recalculated	DATE Calculated ____	COUNTY OF LOS ANGELES E. PERFORMANCE MEASURE A Entered Employment Rate (Youth)

F. LOCAL FACTORS	G. SDA Factor Values	H. NATL AVG. FACTOR VALUES	I. DIFFERENCE (G minus H)	J. WEIGHTS*	K. EFFECT OF LOCAL FACTOR ON PERFORMANCE EXPECTATIONS
1. % Female	52.7	47.2	5.5	.07	.39
2. % 14-15 years old	0.0	6.9	- 6.9	-.66	4.55
3. % 16-19 years old	67.0	81.0	-14.0	-.43	6.02
4. % Black	8	33.7	-25.7	-.02	.51
5. % Hispanic	52	10.9	41.1	-.05	-2.055
6. % Other minority	5.0	3.9	1.1	-.01	- 0.01
7. % Dropout	26.5	23.7	2.8	.02	0.06
8. % UI claimant	* 1.0	1.0	-0-	.62	-0-
9. % Welfare recipient	31.1	32.1	- 1.0	-.18	0.18
10. Average wage for area (000)	16.3	15.3	1.0	.02	0.02
11. Unemployment rate	17.7	9.0	8.7	-.50	- 4.35
				TOTAL ➤	5.319

L. National Departure Point (National Average Performance Level)	28.7%	a
M. Model-Adjusted Performance Standard	34.02%	
N. Parameters Limits	(+) 20 (-) 50	
O. Governor's Adjustment Factor	% pts./$ ( )	
P. SDA Performance Standard	*Local SDA data base was not accurate to estimate ( )computation of this factor. National average was utilized instead.	

S. Department of Labor.Employment and Training Administration

JTPA Performance Standards Worksheet

A. Service Delivery Area's Name

COUNTY OF LOS ANGELES

D. SDA Nu

Performance Period

PY

D. Type of Standard
☐ Plan
☐ Recalculated

Date Calculated ______

E. Performance Measure

Welfare Entered Employment Rate (Ad

Model-Adjusted Performance Standard for the Adult Entered Employment Rate	38.59%
SDA (State) Welfare Entered Employment Rate Ratio	.75
Welfare Entered Employment Rate	22.4%
Model-Adjusted Performance Standard	22.4%
Parameters Limits	(+) 13 (-) 17
Governor's Adjustment Factor	% pts./$ ( )
SDA Performance Standard	/

CHIEF ADMINISTRATIVE OFFICER --
COUNTY OF LOS ANGELES
713 HALL OF ADMINISTRATION / LOS ANGELES, CALIFORNIA 90012
974-1101

HARRY L. HUFFORD
CHIEF ADMINISTRATIVE OFFICER

MEMBERS OF THE BOARD

DEANE DANA
CHAIRMAN

PETER F. SCHABARUM
KENNETH HAHN
EDMUND D. EDELMAN
MICHAEL D. ANTONOVICH

January 9, 1984

To: Each Supervisor

From: Harry L. Hufford **ORIGINAL SIGNED/HLH**
Chief Administrative Officer

Subject: FINANCING REQUIREMENTS OF COUNTY EMPLOYMENT AND TRAINING PROGRAM AND AFDC CASELOAD (ITEM NO. 7, BOARD AGENDA OF JANUARY 10, 1984)

(insert App 16 - 7 pp

In our Board letter, we stated that it will be necessary to process the attached appropriation adjustment to finance projected overexpenditures in the County Employment and Training Program and the mandatory AFDC caseload. This memorandum indicates the size of the estimated overexpenditures and the recommended means of financing.

Budget Shortfall and Means of Financing

-- County Employment and Training Program/General Relief

The 1983-84 Budget assumed an average of 4,700 participants per month. Currently, there are approximately 15,000 participants. Due to this higher than expected caseload, funds are presently being expended at a rate of $3.0 million per month, compared to a budget of $1.42 million per month. At the present rate, General Funds will be exhausted by the end of January and it is estimated that the total program cost will exceed the budget by $12.4 million.

Although the monthly rate of expenditure is expected to decrease later in the year as DCS' program controls take effect, additional experience is required before we can accurately estimate the size of the shortfall.

-- Aid to Families With Dependent Children

As indicated in the Board letter, based on the expected upturn in the State's economy, we projected decreasing AFDC caseloads during 1983-84. Instead of the expected downturn, the trend will result in an average monthly caseload (180,760) that is 4.4% above the budgeted caseload (173,150). Currently, we are estimating an overexpenditure of $31.5 million above the budgeted appropriation of $932.4 million. Since most of the projected aid payments are offset by Federal and State revenues, only $1.7 million in Net County Cost will be required.

-- Means of Financing

Of the total $14.1 million in Net County Costs associated with the mandated AFDC caseload requirements and the County Employment and Training Program costs (see the attached chart), we have identified local financing from the following unanticipated sources:

- $9.2 million in increased Vehicle License Fees. This is due to the improved economy, reflected by increased automobile sales, and is based on recent State Department of Finance estimates and our receipts to date.
- $1.2 million from the Contract Cities Liability Insurance Fund to reimburse the General Fund for paid Sheriff automobile accident settlements associated with contract cities' services.
- $3.7 million in additional interest earnings reflecting higher than anticipated cash balances for investment purposes.

We will continue to closely monitor the caseloads within these and other welfare programs and will advise the Board should further action be necessary.

I plan to place this appropriation adjustment on the January 17, 1984 Board agenda for your consideration.

HLH:GAR
TS:ca
J25:f
Attachments

cc: Auditor-Controller
County Counsel
Department of Community Services
Department of Public Social Services
Treasurer-Tax Collector

Attachment

SUMMARY OF FINANCIAL REQUIREMENTS AND MEANS OF FINANCING

	Requirement/ Financing (in Millions)
Additional Welfare/Employment Training	
Program Requirements	
County Employment and Training Program	$12.4
AFDC	31.5
Total Requirements	$43.9
Additional Overrealized Revenue	
Vehicle License Fees	$ 9.2
Contract Cities Rebate	1.2
Interest Earnings	3.7
State and Federal Aid for AFDC	29.8
Total Available Financing	$43.9

ea/J25:f

BOARD OF
SUPERVISORS
OFFICIAL COPY

76A 350M 10-61

COUNTY OF LOS ANGELES

REQUEST FOR APPROPRIATION ADJUSTMENT

DEPT'S. NO. 060

DEPARTMENT OF Chief Administrative Office

January 09 84

AUDITOR-CONTROLLER.
THE FOLLOWING APPROPRIATION ADJUSTMENT IS DEEMED NECESSARY BY THIS DEPARTMENT. WILL YOU PLEASE REPORT AS TO ACCOUNTING AND AVAILABLE BALANCES AND FORWARD TO THE CHIEF ADMINISTRATIVE OFFICER FOR HIS RECOMMENDATION OR ACTION.

ADJUSTMENT REQUESTED AND REASONS THEREFOR

Nondepartmental Special Accounts Services & Supplies Fee Increases	Specialized Career Rehabilitation/Employment Other Charges
(13721-2002)	(27190-5502)
$ 4,825,263	$12,355,867
Contingency State-Aid	PSS - AFDC Other Charges - FG
(13690-2002)	(26431-5502)
$39,002,342	$31,471,738
$43,827,605	$43,827,605

CHIEF ADMINISTRATIVE OFFICER'S REPORT

REFERRED TO THE CHIEF ADMINISTRATIVE OFFICER FOR— ACTION

RECOMMENDATION

AUDITOR-CONTROLLER BY

NO. 19

APPROVED AS REQUESTED AS REVISED

19 CHIEF ADMINISTRATIVE OFFICER

APPROVED (AS REVISED): BOARD OF SUPERVISORS 19

BY DEPUTY COUNTY CLERK

SEND 4 COPIES TO THE AUDITOR-CONTROLLER

CHIEF ADMINISTRATIVE OFFICER
COUNTY OF LOS ANGELES
713 HALL OF ADMINISTRATION / LOS ANGELES CALIFORNIA 90012
974-1101

January 9, 1984

HARRY L. HUFFORD
CHIEF ADMINISTRATIVE OFFICER

MEMBERS OF THE BOARD

DEANE DANA
CHAIRMAN

PETER F. SCHABARUM
KENNETH HAHN
EDMUND D. EDELMAN
CHAEL D. ANTONOVICH

ORIGINAL SIGNED/HLH

To: Each Supervisor

From: Harry L. Hufford
Chief Administrative Officer

Subject: REPORTS ON COUNTY EMPLOYMENT AND TRAINING PROGRAM (AGENDA ITEM NO. 7, JANUARY 10, 1984)

On December 27, 1983, on motion of Supervisor Edelman, the Board instructed the Director of the Department of Community Services (DCS) to report on the allegations of mismanagement of the Job Training Partnership Act (JTPA) Program. In addition, the Director of Public Social Services (DPSS), the Private Industry Council (PIC), and Chief Administrative Officer were also instructed to independently report on this program within two weeks.

Department of Community Services

The attached DCS report responds to the issues raised during the testimony given by the Legal Aid attorneys and County contractors. As indicated, the concerns center around the policy issue as to which clients should be served and the implementation procedures of the County Employment and Training Program. We concur with the Department that the program will provide an opportunity for the current participants to enter unsubsidized employment or receive a significant training opportunity.

Department of Public Social Services

The DPSS report indicates that while they believe the basic concept behind the program is sound, the Department has only a limited role of eligibility determination and referral of employable participants to DCS. The testimony presented to the Board did not deal with DPSS' responsibilities.

Private Industry Council

The PIC is currently developing recommendations regarding policies for the JTPA program that will begin July 1, 1984. These recomendations will be presented to the Board later this month. They will include the major policy issues of which persons in the County should be served and the types of training. We concur with the

PIC that it would seem appropriate that any major policy change in the County Employment and Training Program come from this process and be implemented beginning with the new program year on July 1.

Chief Administrative Office

We have filed a Board letter for the January 10 agenda which states that the County program is consistent with the stated objectives of the pertinent Federal and State laws. The goals of the program and reasons for targeting the employable portion of the General Relief caseload remain valid. Unanticipated caseload increases have resulted in projected overexpenditures. We will continue to monitor the caseloads and expenditures and advise the Board of any necessary corrective action.

HLH:GAR
TS:fb
38:r
Attachments

cc: County Counsel
Director, Community Services
Director, Public Social Services
Private Industry Council

COUNTY OF LOS ANGELES
DEPARTMENT OF COMMUNITY SERVICES

3175 West Sixth Street / Los Angeles, California 90020
(213) 738-2611

DONALD G. GALLOWAY
Director

STEPHANIE KLOPFLEISCH
Chief Deputy Director

BOARD OF SUPERVISORS
PETER F. SCHABARUM
KENNETH HAHN
EDMUND D. EDELMAN
DEANE DANA
MICHAEL D. ANTONOVICH

January 9, 1984

To: Each Supervisor

From: Donald G. Galloway, Director

Subject: COUNTY EMPLOYMENT AND TRAINING PROGRAM
FOR FORMER GENERAL RELIEF RECIPIENTS (SCREP)

On December 27, 1983, several poverty attorneys and a small group of service providers appeared before your Board and made a number of allegations regarding the County's Employment and Training Program for former General Relief recipients (SCREP). As directed by your Board, attached is a series of responses to the allegations which were made.

Report

In specific terms, most of the allegations made were simply not true. However, more generally, the concerns of the poverty attorneys and a small number of service providers fall into two categories:

- The department is operating an Employment and Training Program. The Legal Aid groups have repeatedly taken the department to court to force more welfare features into the program. This has resulted in a slowness in discontinuing persons from the program and contributed to an increase in our costs. We anticipate that there will be continued periodic legal challenges by the poverty attorneys.
- Some service providers have complained about the program because of reduced slot costs, requirement of performance contracts and mandatory services to former General Relief recipients. These features, however, are consistent with the department's efforts to provide the greatest possible number of training and job placement opportunities for participants.

The program caseload has been much higher than anticipated. The program was planned for an initial intake of approximately 9000 persons. On October 1, 1983, the program start date, the department received over 13,500 GR referrals and during the first month there was an additional intake of over 4000 clients. Nevertheless, the basis of the program is valid and with adequate financing we believe that many persons who would otherwise have remained on the welfare rolls will become employable and obtain unsubsidized jobs.

Summary

SCREP is very different from any previous employment and training program offered by the County. It offers single adult indigent residents of the County an opportunity for employment and training as an avenue to economic self-sufficiency. We believe this is still a valid goal. The unanticipated size of the caseload has caused some difficulties in program implementation, most of which are now resolved. Financing issues will be reported to your Board separately by the Chief Administrative Office. I continue to support the program and believe in its ultimate effectiveness in assisting former welfare recipients to become self-supporting and in reducing the County's welfare cost.

If you have any questions or need any information, please let me know or your staff may contact Donna Dunn at 738-2619.

DGG:rk
Attachments

RESPONSES TO SPECIFIC ALLEGATIONS REGARDING THE COUNTY'S EMPLOYMENT AND TRAINING PROGRAM FOR FORMER GENERAL RELIEF RECIPIENTS AT THE BOARD OF SUPERVISORS MEETING OF DECEMBER 27, 1983

1. ALLEGATION:

Participants have to wait long hours in line to receive stipend checks. On December 27, 1983, there were 100 people waiting in line at the Indo-Chinese Service Center.

RESPONSE

On paydays the service centers can develop lines of participants waiting for checks. However, staff is present and order is always maintained. In general, program participants must wait for short periods of time in order to receive their stipend checks. There are, however, a instances in which there are special problems, i.e., participant does not have correct identification, a check sent in the mail was not received, etc. In these instances, participants must sometimes wait several hours while program staff work to resolve the problem.

It is true that there was a long line of participants at the Indo-Chinese Service Center when the Center opened on December 27, 1983. Most of these participants were new intakes into the program. Others had not received a check sent through the mail or had other special problems. The new intakes were handled very quickly. Special problems were resolved by staff on a case by case basis as expeditiously as possible.

2. ALLEGATION:

The program is costly to the County because persons failing to comply are not being discontinued.

RESPONSE

Approximately 1,000 persons have either been discontinued or notified of appeal hearing date prior to discontinuance from the program. The discontinuance procedures are in place.

It is true that there was an initial delay in instituting discontinuances because poverty attorneys challenged discontinuance procedures which subsequently had to be modified and approved by the court prior to implementation. The higher than anticipated caseload also contributed to a delay in discontinuances.

Persons are discontinued from the program if they decline to participate, apparently have other resources, or if they fail to comply with the basic program requirements of which they have been advised.

3. **ALLGEATION:**

Program participants are unable to obtain free medical services at County facilities.

RESPONSE

This allegation is not true. The program participants can receive free medical services by presenting their most recent stipend paystub to the Ability To Pay units at County facilities. The department is working with the Department of Health Services to determine if the eligibility determination process in County Health facilities can be expedited.

4. **ALLEGATION:**

Problems with checks sent through the mail have caused massive evictions of program participants from their residences due to non-payment of rent.

RESPONSE

This allegation is not true. Program participants are single adults and some of them are very mobile. As a result there are instances when checks sent through the mail are not received by the participant. The department has procedures in place to assist participants who are threatened with eviction. Department staff have contacted landlords on the behalf of participants and when necessary have issued emergency lodging vouchers.

5. ALLEGATION:

In the overall program only a relatively small number of former General Relief recipients are in training programs, i.e., 1,800 persons.

RESPONSE

This allegation is not true. The County's Employment and Training Program for former General Relief recipients includes a variety of training, work experience and educational opportunities. The approximately 16,000 participants are receiving one or more of the following services: training for employment, job placement, job search, work experience remedial education and English as a Second Language (ESL)training.

6. **ALLEGATION:**

Participation by former General Relief recipients in the County's Employment and Training Program should be voluntary and the Federally funded portion of the program should be opened to the population previously served.

RESPONSE

This is a public policy issue. The Department's Employment and Training Program has been targeted to serve the single most demonstrably needy segment of the population, all of whom are eligible for training services. More than 50% of the County's Job Training Partnership Act (JTPA) resources are budgeted for services to eligible persons other than former General Relief recipients.

7. ALLEGATION:

Why cannot program participants' checks be mailed to them?

RESPONSE

At the present time approximately 7,000 participants receive their checks by mail. Most of the problems experienced with paychecks are with those sent by mail. These problems result from persons moving or checks being lost in the mail. The participants are inconvenienced while staff attempt to trace the check and resolve the problem.

The department, beginning with the February payroll, intends to contract out the issuance of paychecks to private sector vendors around the County. This will provide additional sites where participants may pick-up checks and should be more accessible to participants.

8. ALLEGATION:

Program participants have limited phone access to staff to resolve problems.

RESPONSE

The department has four SCREP hot lines to provide information and resolve problems for participants. These lines are heavily used and are often busy. Within the next few weeks the department will be establishing six additional phone lines at various locations around the County.

9. ALLEGATION:

The Chinatown Service Center with its special program skills to serve the Asian population is being underutilized.

RESPONSE

While it is true the Service Center was initially sent clients of ethnic background other than Asian, this has been corrected. The department has reassigned persons initially referred in error, and is working closely with the agency to refer appropriate persons for employment and training services.

10. **ALLEGATION:**

Administration of the Employment and Training Program for former General Relief recipients is not cost-effective because of highly-paid staff involvement.

RESPONSE

This allegation is not true. In order to transition General Relief recipients from a welfare program into the Employment and Training program with contract services it was envisioned there would be extensive early involvement of technical/professional staff. The referral of higher than anticipated numbers of trainees has dictated a continuing presence of this staff to accommodate the trainees. The Department is now preparing additional contract recommendations for some elements of the program which are labor intensive. Administration of the program has, however, been very cost-effective in that it has essentially been carried out within existing resources.

11. **ALLEGATION:**

Contracts with service providers do not provide sufficient funds to ensure adequate training of participants.

RESPONSE

The County program focuses on providing specific training for entry level jobs for the County's employable General Relief (GR) recipients. Such positions are by their nature nontechnical and the training should be less costly than training for more highly technical jobs.

Payments to the services providers were computed in accordance with a zero budget model. Agencies were requested to determine their administrative and training costs with a given stipend (needs based payment) for each participant. In most cases employment training was limited to classroom training for a variety of entry level employment opportunities. Average adult/youth slot cost for nine months for all 52 agencies which include training, stipend and administration was $3,956.

12. **ALLEGATION:**

The Private Industry Council (PIC) recommended a specific number of training slots. The Department of Community Services arbitrarily doubled the number of slots.

RESPONSE

This allegation is not true. Los Angeles County's State approved plan required that 11,760 individuals receive employment training services under the 1983-84 Job Training Partnership Act (JTPA) Program. In order to achieve this objective in only a 9-month program year with limited funding and service provider resources, it was determined that training of partcipants would be accomplished in two training cycles thus allowing agencies to train two participants for each slot during the course of the program year.

13. ALLEGATION:

There was not enough public input in the development of this year's JTPA plan.

RESPONSE

Because of the lateness of the State's release of planning instructions and of the appointment of the new Private Industry Councils (PIC), the opportunity for public input throughout California was more limited than in past years. Nevertheless, a State review of the County's planning process, dated November 29, 1983, found that the current plan was developed, submitted, and approved in accordance with the Job Training Partnership Act (JTPA).

Special efforts are being made to ensure that all interested persons and groups have adequate opportunity for input into the upcoming 1984-86 Plan. These efforts include the formation of an ad hoc contractor planning committee to advise the department in the development of planning policies, and a series of PIC Planning Committee meetings at which the guidelines for the 1984-86 program will be formulated.

EDDY S. TANAKA
DIRECTOR

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC SOCIAL SERVICES
3401 RIO HONDO AVENUE, EL MONTE, CALIFORNIA 91731/TEL. (213) 572-6780
P. O. BOX 3493, EL MONTE, CALIFORNIA 91731

January 5, 1984

To: Each Supervisor

From: Eddy Tanaka, Director

Subject: COUNTY EMPLOYMENT AND TRAINING PROGRAM

This is in response to the Board's request for a report concerning the County's Employment and Training Program.

The basic concept behind the County's program is a sound one. It is designed to provide training opportunities to the employable indigents in the community. This population has severe barriers to finding and retaining employment and is among those most in need of employment training.

My Department's role in the program is limited. We refer eligible General Relief (GR) recipients to the Department of Community Services for enrollment in the program. When we determine that an employable applicant meets all GR eligibility criteria, he is referred to the Department of Community Services for placement in a training slot. My Department's responsibility ceases with the referral.

Operational problems with the program were caused by an initial one-month surge in the number of individuals determined eligible to participate. However, the referral rate normalized in the second month of operation, and the total number of individuals referred is within the number estimated by my Department, although the GR approved caseload is exceeding budget estimates. There also appear to be some problems in assigning participants to training slots and problems in disenrolling those individuals who do not cooperate with the program.

I have reviewed the testimony presented to your Board on December 27 and found that none of it falls under the purview of my Department's responsibilities. Rather, the testimony focuses on technical questions of the JTPA law, contracting for services, and DCS's internal operations and procedures.

ET:lml

cc: Chief Administrative Officer

JAN 05 1983

County of Los Angeles
Private Industry Council

3175 West Sixth Street / Los Angeles, California 90020

BOARD OF SUPERVISORS
Peter F. Schabarum
Kenneth Hahn
Edmund D. Edelman
Deane Dana
Michael Antonovich

January 9, 1984

To: Each Supervisor

From: Berwyn Fragner, Chairperson

Subject: **REQUEST FOR REPORT ON GENERAL RELIEF EMPLOYMENT PROGRAM**

This is in response to your request for a report from the Private Industry Council (PIC) regarding the advisability of major changes in the current focus on the County's job training program for former General Relief recipients. I am writing to you as Chair of the PIC because the next PIC meeting will not occur until after the date when you have requested this response.

As concerns the County's job training program for former General Relief recipients, the PIC is acutely aware of the controversy which has surrounded the emphasis on training General Relief recipients to the exclusion of other eligible adult groups. The PIC asked the Department of Community Services to establish a service providers forum to deal with the numerous concerns of the contractors regarding program implementation and specific funding and contractor complaints.

As you know, the present PIC was not involved in the original drafting of the current Plan, although we did approve it. We have established a Policy Development, Goal Setting and Planning Committee specifically charged with responsibility to draft a plan for the Jobs Training Partnership Act Program that will begin July 1, 1984. This draft plan will be provided to your Board late this month and will cover the kinds of people in the County to be served, the types of training that should be offered, and other policy issues.

We do not believe that it would be in the best interests of anyone to make a major policy shift in the County's employment and training program at this point in time. Our 1984 plan will be formalized after input from the Board, and after a public hearing currently scheduled to occur in the early Spring.

Thank you for the opportunity to comment on the job training program. I look forward to continued discussions with your Board as planning for next year's program proceeds.

BF:rk
cc: Harry L. Hufford
DeWitt Clinton